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# **CITY OF BROCKTON MASSACHUSETTS**

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## **2014 Annual Plan**

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### **BROCKTON REDEVELOPMENT AUTHORITY**

**50 SCHOOL STREET  
BROCKTON, MA 02301**

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## **Executive Summary**

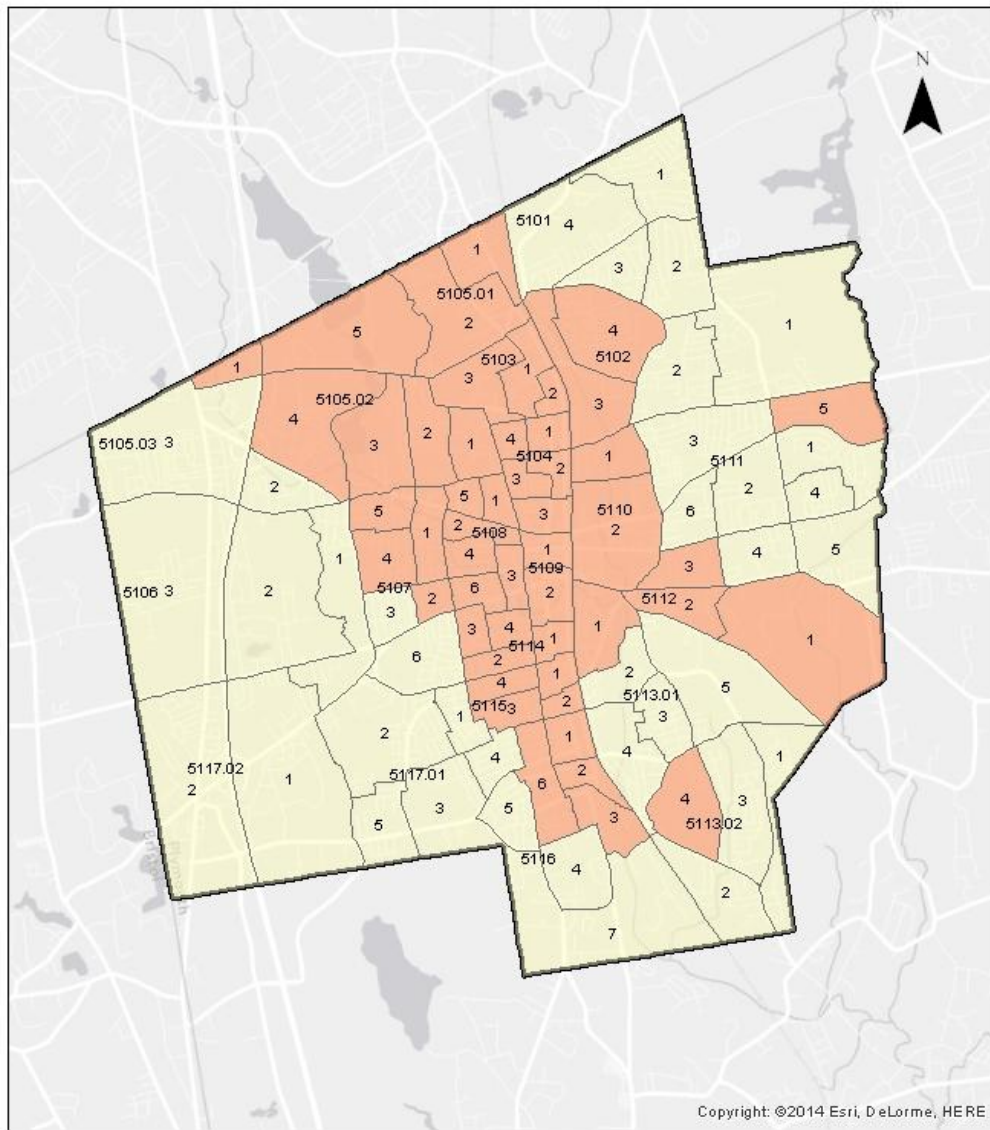
### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

This Annual Action Plan contains the objectives and outcomes, which the City of Brockton, Massachusetts through the Brockton Redevelopment Authority and the Brockton Housing Authority propose to accomplish over the next program year, beginning July 1, 2014 and ending June 30, 2015. The proposed activities will be funded by the U.S. Department of Housing and Urban Development (HUD), under the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs.

Brockton's continuing housing and community development strategy is a logical response to the social service needs of a predominately low and moderate income population, high unemployment and crime rates, the overall age of the housing stock and public facilities, an inadequate supply of affordable housing and the continuation of foreclosures and abandonment of properties rendering Brockton one of the most negative municipalities in the state. The most pressing needs include the improvement or replacement of older public facilities, enhancement of public safety, housing rehabilitation assistance to low and moderate income households and mechanisms to prevent further destabilization of marginal neighborhoods. In addition, support is needed for public services in the aid of lower income families and individuals, enhanced crime prevention and job creation through economic development.

## 2010 Census Tract Block Groups, Brockton MA



Cartography By Xue Sherry Zou, 4/28/2014  
Data Source: MassGIS and US Census 2010

0 0.5 1 2 3 4 Miles

### Legend

- Low-Mod Income Census 2010 (At least 51% of population's income equal/below 80% of AMI)
- City of Brockton

### Brockton Low-mod Income Area

Annual Action Plan  
2014

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## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Consolidated funds for the 2014-2015 program year will be allocated among the following objectives and outcomes:

### ***Housing Objectives:***

- Maintain, support and preserve the existing housing stock, prevent housing deterioration and vacancies, prevent neighborhood deterioration due to foreclosures.
- Increase the overall availability of affordable permanent housing through the creation of new units and rehabilitation of vacant deteriorated properties to return to habitable condition.
- Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting balance between housing development, transportation, open space and recreational facilities, and appropriate commercial development opportunities.

*Outcomes for these objectives will be measured against:*

- The number of housing units rehabilitated or prevented from becoming deteriorated and/or vacant.
- The number of affordable units developed through new construction or the restoration and re-occupancy of vacant and deteriorated units.
- Determining if new neighborhoods have been created or if existing neighborhoods have been enhanced through smart growth.

### ***Non Housing Community Development Objectives:***

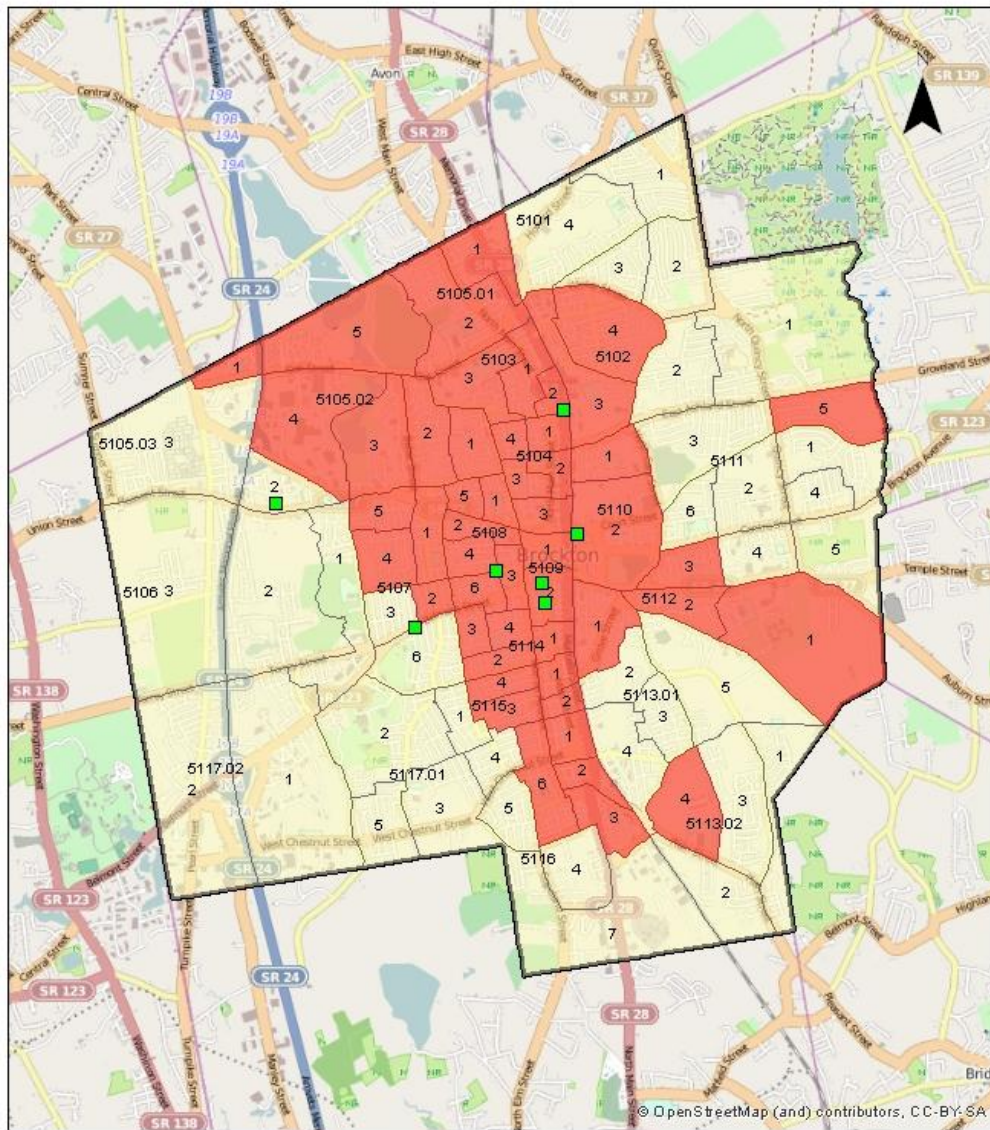
- Assist in reduction of crime.
- Enhance the quality of life through the provision of better public facilities, through neighborhood stabilization efforts, and through infrastructure improvements aimed at economic development.
- Assist in the reduction of poverty and improve the quality of life for low and moderate income residents of the city by expanding economic opportunities and through support for vital social/public service providers and facilities that can help create and/or retain jobs.

*Outcomes for these objectives will be measured against:*

- Increase or decrease of crime statistics.

- Improvements or additions to public facilities and infrastructure.
- Determination of the number of low and moderate income individuals and families aided by public service providers who are supported in part by CDBG funds.
- Evaluation of changes in quality of life status as a result of the provision of services and evaluation of actions that serve to expand economic opportunities, including verification of numbers of jobs created or retained.

## Public Services, Brockton MA



Cartography By Xue Sherry Zou, 4/28/2014  
Data Source: MassGIS and US Census 2010

0 0.5 1 2 3 4 Miles

### Legend

- Public Services
- Mobile Anti Crime Task Force
- City of Brockton

### Public Services FY2014

Annual Action Plan  
2014

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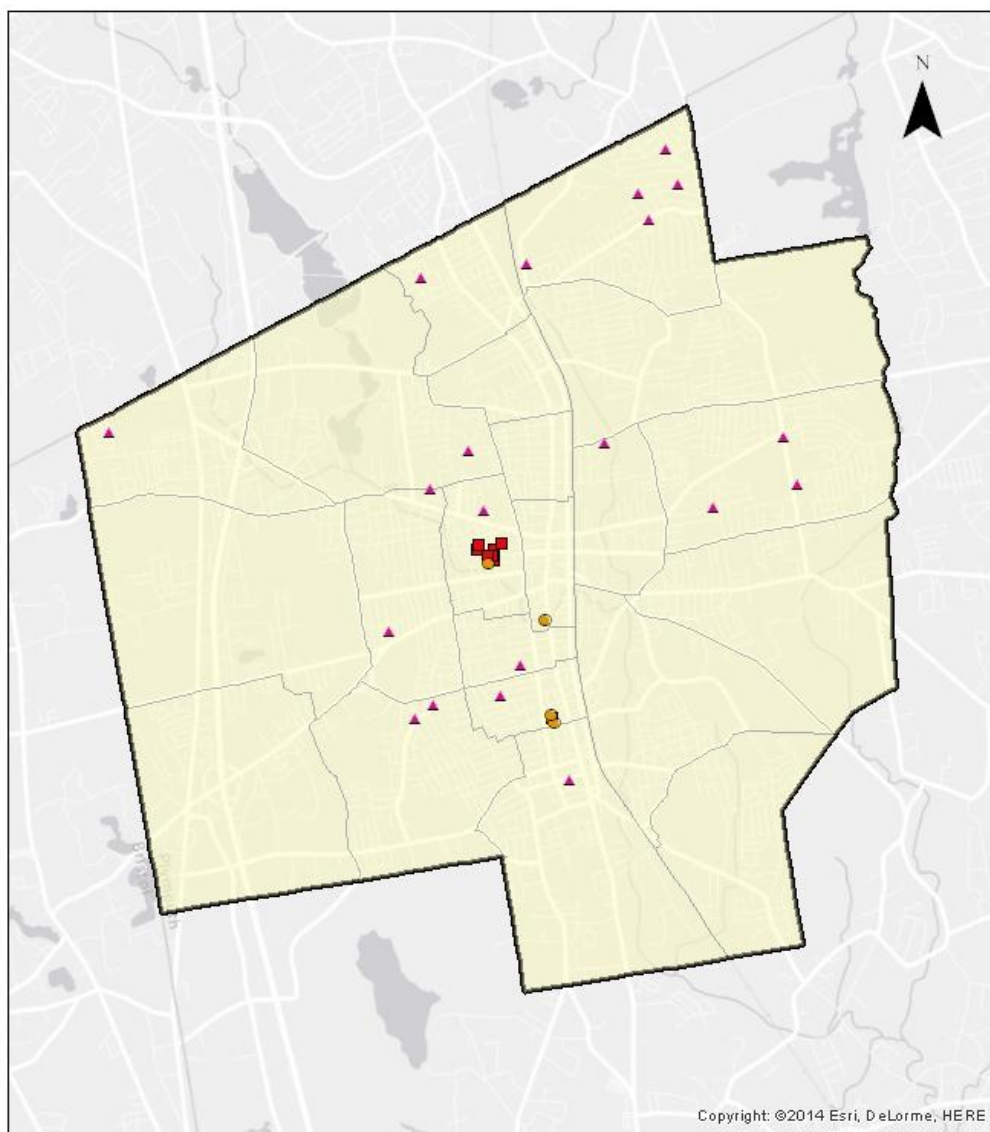
### **3. Evaluation of past performance**

The City of Brockton through the Brockton Redevelopment Authority and the Brockton Housing Authority evaluates performance of each program year through publication of an annual Consolidated Annual Performance and Evaluation Report (CAPER). The BRA and BHA will continue this practice to evaluate past performance.

On an annual basis, the City of Brockton has historically allocated a significant portion of its Community Development Block Grant entitlement and HOME grant to rehabilitate the homes of low and moderate income homeowners and to assist low and moderate income individuals and families to become homeowners. During the past few years, Brockton has made significant progress in meeting its housing goals, although real estate costs and the cost of deleading of certain properties have contributed to a somewhat lengthy and expensive process. This plan aims to better achieve these goals through closer cooperative actions with other housing providers and a more focused leveraging of CDBG and HOME funds. Brockton has consistently provided financial resources for the development of new units and rehabilitation of existing units to benefit low and moderate income residents. During this year Brockton will continue to do so as circumstances permit and will also seek to return vacant/foreclosed properties to habitable condition for the benefit of low and moderate income homebuyers and renters.

Brockton's strategies over the past several decades have consistently played a significant role in providing support for expanding economic opportunity and for helping to provide essential public services particularly to low and moderate income persons. CDBG assistance at the maximum level of 15% of Brockton's annual entitlement has historically been extended to a fairly broad network of locally and regionally based public service providers to support diverse but generally complementary public services programs, many involving job skills development. This continues to be the case under the FY2014 Annual Plan. The Brockton Redevelopment Authority expects to continue to be an active member of the Mayor's Economic Advisors group and to continue to support efforts to create economic opportunity through public facility improvements that result in the creation and retention of jobs as well as direct investment in small businesses. The BRA plans to work with other economic development focused parties to target vacant and deteriorated commercial properties with code enforcement efforts combined with offers of reasonable financial assistance in order to improve the living and working environment in Brockton. The Brockton Housing Authority has a well established Family Self-sufficiency program which works to empower low income public housing tenants through financial and employment self sufficiency training. In this Annual Action Plan, these efforts will continue to be a part of Brockton's strategy.

## Housing Projects Completed, Brockton MA



Cartography By Xue Sherry Zou, 4/23/2014  
Data Source: MassGIS and US Census 2010

0 0.5 1 2 3 4 Miles

### Legend

- CDBG + NSP Demolition Sites
- CDBG + NSP Rehabilitation Sites
- ▲ CDBG Rehabilitation Sites
- City of Brockton

### Completed Housing Projects

Annual Action Plan  
2014

#### **4. Summary of Citizen Participation Process and consultation process**

Citizens, public agencies and other interested parties can request, in writing, information and records concerning Brockton's Annual Action Plan and its use of assistance under the CDBG and HOME programs for the upcoming program year. The City will make available within 10 days, any information which does not violate the privacy of any person or involve personnel matters. In accordance with federal regulations, the City will make the Citizens Participation Plan, the Annual Action Plan and the Consolidated Annual Performance Evaluation Report available through the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library and the branch libraries as well as the City of Brockton's web site and the Brockton Redevelopment Authority web site. Interested citizens may also call the Brockton Redevelopment Authority at 508-586-3887 for a copy or may be obtained at the office of the Brockton Redevelopment Authority, 50 School Street, Brockton, MA 02301.

Citizen participation at all stages of the CDBG program is encouraged, particularly by persons of low and moderate income who live in areas of slum and blight are in areas proposed for CDBG and HOME funded activities. All written comments relative to the CDBG and HOME programs are to be answered within 10 days.

The Brockton Redevelopment Authority and Brockton Housing Authority will hold two (2) public hearings to:

- To obtain the views of citizens on community development and housing needs and to obtain proposals and comments on the activities to be undertaken and the development of the proposed Annual Action Plan for both the CDBG and HOME Programs.
- Provide citizens the opportunity to comment on the prior year's performance on the CDBG and HOME program funds expended and the status of funds being expended. There will be a fifteen day comment period after the public hearing to receive comments.

All notices of public hearings are published at least twice ten (10) days prior to the hearing date in the legal section of the Brockton Enterprise. Public Hearings are held in the GAR room, on the second floor of City Hall, 45 School Street, Brockton, MA 02301 or another location that has handicap accessibility. Translation assistance will be made available upon request for non English speaking persons.

The first public hearing was held on January 15, 2014 in the GAR room at City Hall. Those in attendance were the following:

- Kevin Harriman, Brockton Housing Authority
- Robert Jenkins, Brockton Redevelopment Authority
- Paul Morrison, Brockton Redevelopment Authority
- Ewana Lindo-Smith, Brockton Redevelopment Authority

- Sherry Zou, Brockton Redevelopment Authority

Citizens in attendance:

- Brian Moriarty, Neighborhood Housing Services
- Vivian Rene, Old Colony YMCA
- Barbara Duffy, BAMSI
- John Yazwinski, Father Bill's and Mainspring
- Brian O'Connor, South Coastal Counties Legal Services
- John Eastman, Self Help Inc.
- Maria Pinto, Cape Verdean Association

The second public hearing was held on April 23, 2014 in the GAR room at City Hall. Those in attendance were the following:

- Robert Jenkins, Brockton Redevelopment Authority
- Ewana Lindo-Smith, Brockton Redevelopment Authority
- Sherry Zou, Brockton Redevelopment Authority

Citizens in attendance:

None

## **5. Summary of public comments**

Director of NeighborWorks Southern Mass, Brian Moriarty, provided a letter addressed to Mayor Bill Carpenter at the first public hearing. He suggested that first-time homebuyer education is critical to the future of sustainable homeownership in the city. He further encourages the City to explore other available funding opportunities to expand downpayment assistance for first-time homebuyers. Mr. Moriarty stated that a majority of dwellings in Brockton have lead paint because of the age of the housing stock in the city. He inquired about whether federal funding sources be available to subsidize a Mass Housing loan to aid a homeowner with lead paint remediation.

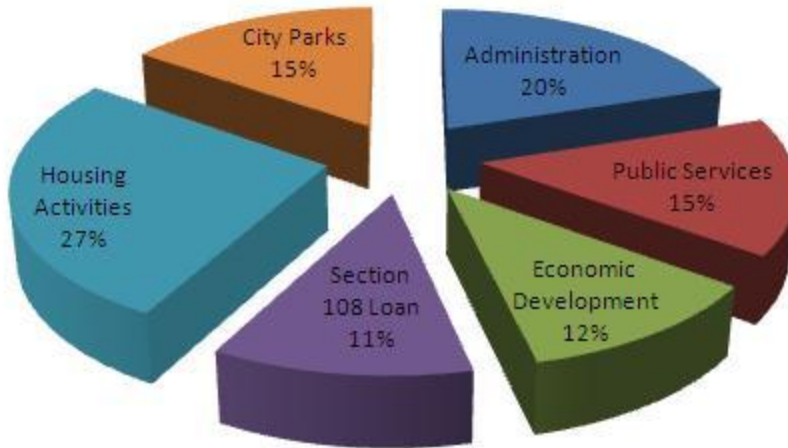
## **6. Summary of comments or views not accepted and the reasons for not accepting them**

There were no public comments that were not accepted.

## **7. Summary**

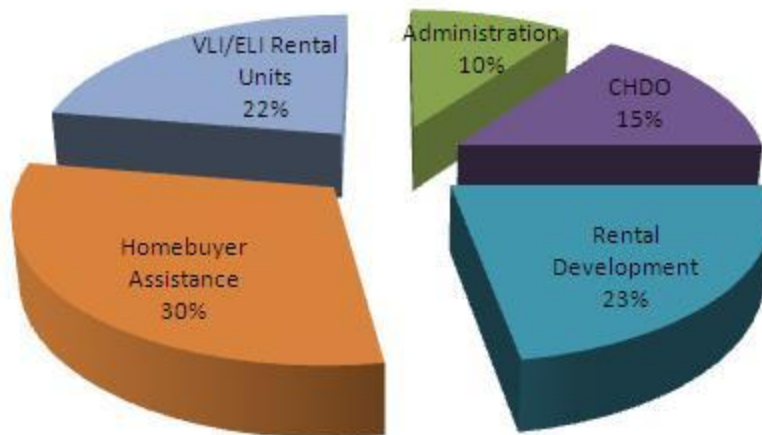
Having assessed needs thoroughly, Brockton's Annual Plan and Consolidated Plan are crafted to carry out all of the activities aimed at addressing the local needs to the greatest extent possible within budgetary constraints of the Community Development Block Grant funds (CDBG) and Home Investment Partnerships Program (HOME). Brockton seeks to leverage these limited resources to the greatest extent possible by better connecting with other public and private resources dedicated to addressing the community needs.

## CDBG Funding Allocations for FY2014



Total CDBG Funding Available FY2014: \$1,376,510.00

## HOME Funding Allocations for FY2014



Total HOME Funding Available FY2014: \$446,728.00

### FY2014 Funding Disbursement

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator			Brockton Redevelopment Authority
HOME Administrator			Brockton Housing Authority

**Table 1 – Responsible Agencies**

### Narrative

The City of Brockton has designated the Brockton Redevelopment Authority (BRA) as the lead agency with respect to the Community Development Block Grant (CDBG) program and the Brockton Housing Authority as the lead agency for the Home Investment Partnership Program (HOME). It is the responsibility of these agencies, under the direction of the Mayor, Bill Carpenter, to prepare and submit the City of Brockton's FY2014 Annual Plan. The Brockton Redevelopment Authority has been the lead agency for the past 40 years. The Brockton Redevelopment Authority has been assigned responsibility for the preparation and submission of the previous Consolidated Plan and plays a critical role in the planning of activities.

The Process: In addition to the publically advertised Citizens Participation process, the Brockton Redevelopment Authority has sought out and encouraged input and involvement of public agencies, the business community, community based organizations and other groups in the determination of community development objectives, priorities and resource allocations. The significant aspects of the process employed to develop the Consolidated and Annual Action Plan included:

1. An in depth review of data, annual reports, newsletters, special reports and plans having regional and local significance.
2. Seeking public input at advertised public hearings and inviting written comments.

3. Participation in forums on housing and social services issues.
4. Outreach to public instrumentalities involved in housing, public works and public services as well as planning and community development.
5. One on one outreach by way of personal and telephone interviews to a wide range of public and private community based organizations similarly involved in activities reflecting CDBG and HOME goals.

### **Consolidated Plan Residential Survey Summary**

- \* A majority of respondents were long term residents of Brockton. 71% lived in the City for 10 years or more, while just 14% were non-residents. Residents living in the City for less than a year made up 2% of respondents, more than 1 year but less than 10 years made up 13%.
- \* The majority of the respondents were from the West Side of the City, although residents from across the city were represented.
- \* 41% of respondents work in the city (many of which owned businesses) - 21% have children in the Brockton Public Schools - nearly 25% participate in recreational, cultural or leisure activities.
- \* 60% respondents were female, 40% were male.
- \* 72% were white, 22% black, 6% were Hispanic
- \* 68% indicated they were employed full time, 9% part time, 5% were students, 12% retired, 5% under or unemployed, 2% unable to work.
- \* 62% lived with a spouse, 32% have children living at home, 10% were single parents, 7% had elderly living in the home and 8% lived alone.
- \* The vast majority (78%) were home owners, 15% were renters, 1% homeless. 8% have difficulty making monthly housing expenses and 5% have been late paying rent or mortgage in the past six months.

Summary of Comments Received:

\* The majority of the responses indicated that affordable housing is of the utmost importance, safety and economic development were also very high on the scale. A high percentage of the responses also indicated that the foreclosure crisis (number of vacant or abandoned properties) is very important and needs to be addressed. Street repairs and such were also important to most responders.

### **Consolidated Plan Public Contact Information**

#### **Community Development Block Grant Program (CDBG)**

Mr. Robert Jenkins, Interim Executive Director  
Brockton Redevelopment Authority  
50 School Street  
Brockton, MA 02301  
Telephone: 508-586-3887  
rjenkins@brocktonredeveopmentauthority.com

#### **Home Investment Partnerships Program (HOME)**

Mr. Thomas G. Thibeault, Executive Director  
Brockton Housing Authority  
45 Goddard Road  
Brockton, MA 02301  
Telephone: 508-588-6880  
Email: tomt@brocktonhousingauthority.com

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Brockton acting through the Brockton Redevelopment Authority and Brockton Housing Authority have continuously sought input as to the most pressing needs facing the City of Brockton and in particular, its low and moderate income and minority populations. A number of methods were employed to consult with Brockton residents, non-profit organizations, and social service providers including inter-agency meetings, public hearings and forums. The City has relied heavily on these consultations in the development of the Consolidated Five Year Plan. The City will continue to encourage and maintain open lines of communication with all citizens, organizations and agencies throughout the life of the Consolidated Plan and in the preparation and implementation of Annual Action Plans.

A notice regarding the two public hearings held on the plan were published in the local Enterprise newspaper at least ten days prior to the hearing. A link to the draft plan was placed on the BRA website at [www.brocktonredevelopmentauthority.com](http://www.brocktonredevelopmentauthority.com). In addition, the draft plan was available for comment at the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library and the two branch libraries.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of Brockton is the largest municipality in Plymouth County with a population of nearly 100,000 and works with and provides financial assistance to nine public service agencies. Our activities are geared to enhance coordination between public and assisted housing providers and private and governmental health, mental health and other services agencies which include the following activities:

1. With the limited funding we have, we have provided more affordable housing units. In the past five years, Brockton went from zero to 42 permanent housing units for chronically homeless individuals, and 10 permanent housing units for chronically homeless families.
2. Due to the coordination between mental health and service agencies there were fewer homeless individuals on the streets of Brockton. In five years, Brockton has seen a reduction of 88% homeless people sleeping on the streets. In 2007, Brockton had 102 people on the streets. That number has dropped to a total of 11 individuals as of January 2014.
3. We work with and synchronize with providers for better outcomes for sheltered individuals. Since 2009, several providers have applied a new approach of immediate assessment and triage of guests at their facilities.

4. We are moving toward "Zero Tolerance" of discharges to shelter by other systems: For the past years, with assistance from our partners, we have tracked discharges of people to local housing providers from jails, hospitals, substance abuse treatment and other state systems of care.

5. One of the City's most promising activities is employment and housing for the Work Express Program being run by Father Bills and Mainspring. In fiscal year 2013, Work Express graduated 50 individuals, most who had once been chronically homeless. 89% of those graduates secured jobs, while 100% moved into permanent housing.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Collaborations with the Brockton/Plymouth Continuum of Care and Father Bills & MainSpring through the planning process has taken into consideration the assessments of homeless persons and other concerned parties with respect to the facilities, service, and program needs of homeless individuals and homeless families with children. Emergency shelter for individuals will be provided by Father Bills & MainSpring, located on North Main Street, called "MainSpring House". Emergency shelter for more than 50 families will be provided by the Old Colony YMCA David Jon Louison Center, located on Newbury Street. The David Jon Lousion Center utilizes an extensive community collaborative partnership that collectively meet families' needs. An example of collaboration is the partnership with the Brockton Housing Partnership (consortium of financial lenders and community partners) who provide financial literacy, credit counseling, and individual income and expense counseling to families at the shelter. Other agencies that they collaborate with include but not limited to: South Shore Housing, Northeast Behavioral Health Services, Catholic Charities, South Bay Early Intervention, School on Wheels, St. Patrick's Church etc.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Brockton does not receive ESG funding.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

1	<b>Agency/Group/Organization</b>	BROCKTON AREA MULTI SERVICES INC. / HELPLINE
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	BAMSI Helpline was consulted to provide needs assessment on homelessness for the City. The Helpline anticipated to support approximately 1,200 individuals through its Emergency Services Program that will assist low-income households in Brockton who are facing severe financial hardships which may jeopardize their housing needs. Some of the services include assistance with housing related issues, utility issues, food resources and information on public assistance.
2	<b>Agency/Group/Organization</b>	Father Bills and Mainspring
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Father Bill's and MainSpring (FBMS) was consulted to provide needs assessment on employment training for economic opportunity and community revitalization for public service needs in the city. The WorkExpress program by FBMS anticipated to enroll 50 participants, where 90% of graduates will gain housing and 70% will gain employment. WorkExpress also provides critical landscaping, cleanup and graffiti removal services to improve Brockton neighborhoods.
3	<b>Agency/Group/Organization</b>	Self Help Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Brockton Redevelopment Authority met with Mr. John Eastman, Program Director of Lead Abatement at Self Help Inc. to discuss the City of Brockton's lead paint issues. Mr. Eastman stated that the lead abatement program will be closed by the end of FY2013 and no longer be in service unless more funding becomes available. As a result, lead abatement will no longer be available for Brockton properties starting in FY 2014 until additional funding becomes available.
4	<b>Agency/Group/Organization</b>	BROCKTON HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Brockton Housing Authority and Brockton Redevelopment Authority have met to discuss the housing situations in Brockton and to assist in the completion of this Annual Plan.
5	<b>Agency/Group/Organization</b>	OLD COLONY YMCA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Old Colony YMCA was consulted to provide needs assessment for homelessness in the City. The operation of David Jon Louison Family Center anticipates to provide shelter for daily capacity of 23 families, all receive Case Management services and 24-hour support staff to provide a safe, healthy, positive environment with extensive array of support services to meet the needs of families. Families will complete housing search and work to reducing barriers to housing by setting and achieving goals on Family Care Plan.

Table 2 – Agencies, groups, organizations who participated

**Identify any Agency Types not consulted and provide rationale for not consulting**

Not applicable.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Father Bill's and Mainspring/United Way of Greater Plymouth County	The City of Brockton has established a 10 year plan to end homelessness. Although this plan has had much success over the past several years, the Mayor of Brockton has requested that this plan be assertive and that the members of this committee to end homelessness be more aggressive in moving the plan forward. The plan will include a Housing First approach by creating permanent supportive housing for chronically homeless persons. The plan also includes energizing local businesses, the Brockton Housing Authority and housing developers to create 100 affordable housing units for low income households and last, but not least, to prevent foreclosures and create more affordable housing for low income families in order to prevent their homelessness.
Brockton Open Space and Recreation	City of Brockton Planning Department	The City's Planning Department is currently working on this five year plan, which will inform and direct the department's and the City's direction with regard to the City's recreation and open spaces. This plan will also help provide the BRA with guidance on how and where CDBG funding can augment and assist the City in reaching the goals laid out in the plan.
McCabe Report	Brockton 21st Century Corporation	The Brockton 21st Century Corporation used grant funding to hire an outside consultant to produce the McCabe Report. The report evaluates the downtown Brockton area and makes recommendations for the economic revitalization of the downtown. The report produced in November 2011 has helped and will continue to inform and guide CDBG expenditures in the downtown central business district.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

The Mayor of Brockton has directed the Brockton Redevelopment Authority and Brockton Housing Authority staffs in executing the Annual and Consolidated Plans, to work closely and collaboratively with public and private housing agencies principally the Brockton Housing Partnership and Brockton 21st Century Corporation, other municipal instrumentalities as directed, the Commonwealth's Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services and anti-poverty programs.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

Residents of lower income neighborhoods and other citizens likely to be affected by the CDBG program and the HOME program are to be provided adequate information and the opportunity to express their views on the community development and the needs, proposed activities and projected use of funds and program performance. Low and moderate income residents are encouraged to participate in the development of both the Consolidated Five Year plan as well as the Annual Action Plan. This participation process is directed at English speaking and non English speaking citizens of the community and translations can be made available in Cape Verdean, Hispanic and Haitian upon request. The Brockton Redevelopment Authority has created the Language Access Plan to ensure that clients of the BRA and the city have meaningful access to services, programs and activities although they may be limited in their English language proficiency.

Citizens, public agencies and other interested parties can request, in writing, information and records concerning Brockton's plans and its uses of assistance under the CDBG and HOME programs. The City will make available within ten (10) days, any information which does not violate the privacy of any person or involve personnel matters. In accordance with federal regulations, the City will make the Citizens Participation Plan available through the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library and the two branch libraries. Citizens participation at all stages of the CDBG program is encouraged, particularly by persons of low and moderate income. All written comments relative to the CDBG and HOME programs are to be answered within ten (10) days.

The Consolidated and Annual Actions Plans will take into consideration the comments and suggestions received from interested citizens and public service agencies. Activities entered into the plans will be as a result of those comments to the best of the ability of the City and to the extent of available funds.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	15 Attendees were present at the 1st public hearing held on January 15, 2014.	Director of NeighborWorks Southern Mass, Brian Moriarty, provided a letter addressed to Mayor Bill Carpenter at the first public hearing. He suggested that first-time homebuyer education is critical to the future of sustainable homeownership in the city. He further encourage the city to explore other available funding opportunities to expand downpayment assistance for first-time homebuyers. Mr. Moriarty stated that a majority of dwellings in Brockton have lead paint because of the age of the housing stock in the city. He inquired about whether federal funding sources be available to subsidize a Mass Housing loan to aid a homeowner with lead paint remediation.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community	3 Attendees were present at the 2nd public hearing held on April 23, 2014	No comments received	N/A	
3	Newspaper Ad	Non-targeted/broad community	No response received from newspaper ad	No comments received from newspaper ad	N/A	
4	Internet Outreach	Non-targeted/broad community	No response received from BRA website	No comments received from BRA website	N/A	<a href="http://www.brocktonredevelopmentauthority.com">www.brocktonredevelopmentauthority.com</a>

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

The Mayor has directed the Brockton Redevelopment Authority and Brockton Housing Authority to work closely and collaboratively with public and private housing agencies, principally the Brockton Housing Partnership as well as the Brockton 21st Century Corporation, other municipal instrumentalities as directed, the Commonwealth's Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti poverty programs. The Brockton Redevelopment Authority and Brockton Housing Authority will maintain solid working relationships with the extended network of housing and social service providers operating in Brockton and within the region including the Old Colony Planning Council and the Plymouth County Housing Alliance. The City of Brockton will receive the following funds during the program year. The city will receive a decrease of 2.3% in CDBG and an increase of 4.4% in HOME.

#### Priority Table

Program	Source	Uses of Funds	Expected Amount Available Year 1	Expected	Narrative Description
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	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,376,510	78,473	0	1,454,983	0	The Brockton Redevelopment Authority, acting through the City of Brockton, will continue to monitor and work with the Public Service Agencies and provide oversight to all CDBG activities described in this Annual Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	446,728	225,000	0	671,728	0	The Brockton Housing Authority, acting through the City of Brockton, will continue to provide oversight to all HOME funded activities described in the Annual Plan.

**Table 5 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Wherever possible and to the greatest extent feasible, Brockton will utilize CDBG and HOME funds to leverage additional state, local and private investments in support of affordable housing, public services and economic development initiatives (streetscapes, facade improvement program and Main Street Coordinator). Brockton was provided with an Attorney General's Distressed Properties Identification and Revitalization (DPIR) grant of \$100,000 for a two-year contracted DPIR Coordinator position which began in October 2013. The goal of DPIR Grant program is to not only identify and prioritize a list of REO properties in Brockton, but to ensure that the property owners comply with all state and local ordinances to bring properties into a state of good repair. The DPIR Coordinator is tasked with working with the Plymouth register of deeds and municipal departments to identify and prioritize properties, followed by creating strategies to engage with property owners and advocate for proper rehabilitation and returning the properties to productive residential use.

In recent years the HOME funds have leveraged NSP funds from the Massachusetts Department of Housing and Community Development and private financing from area banks to acquire and rehabilitate vacant, foreclosed, bank owned two and three family homes for the purpose of neighborhood revitalization. Renovated properties have proven to be the catalyst in stabilizing neighborhoods and attracting private investment. Recent projects have also utilized State Chapter 40R Smart Growth Zoning and Housing Production funds. Developers are also using local HOME funds to leverage federal and state low income housing tax credit equity, state and historic tax credits along with DHCD state affordable housing trust funds, state HOME funds and Brownfield funds, VA funds, and private grants. Continued bridge building with stakeholders in the neighborhoods is important to ensure long term vitality. The Brockton Housing Authority's Massachusetts Rental Voucher Program will fulfill the City's HOME match obligation.

Federal funds are also used by subrecipients who apply for additional grant funds from other federal and state government resources, as well as from private foundations. Without being able to use CDBG and HOME funds as matching resources, these subrecipients would not be able to leverage the additional resources necessary to accomplish their respective goals and missions. Matching requirements under HUD CPD programs will be satisfied through monitoring of the subrecipients.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

None have been identified.

### **Discussion**

The City of Brockton and Brockton Redevelopment Authority will continue to seek funding from other sources including private financing, state and local agencies in support of affordable housing, public services and economic development initiatives (streetscapes, facade improvement program and Main Street Coordinator).

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homelessness Prevention	2013	2017	Non-Housing Community Development	City Wide	Homeless/HIV/Aids	CDBG: \$290,302 HOME: \$144,600	Homelessness Prevention: 20 Persons Assisted
2	Preserving Existing Housing Stock	2013	2017	Affordable Housing	City Wide Low and Moderate Census Tracts	Owner Occupied Housing	CDBG: \$645,302 HOME: \$211,728	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Increase Supply of Affordable Housing	2013	2017	Affordable Housing	Low and Moderate Census Tracts	Owner Occupied Housing	HOME: \$321,728	Homeowner Housing Added: 1 Household Housing Unit
4	Stabilize and Improve at Risk Neighborhoods	2013	2017	Affordable Housing	Low and Moderate Census Tracts	Owner Occupied Housing	CDBG: \$824,779 HOME: \$111,728	Homeowner Housing Added: 1 Household Housing Unit
5	Promote Economic Development	2013	2017	Non-Housing Community Development	City Wide	Economic Development	CDBG: \$1,007,034	Facade treatment/business building rehabilitation: 2 Business Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Homeless and At-Risk of Homelessness Services	2013	2017	Homeless	City Wide	Homeless/HIV/Aids	CDBG: \$290,302	Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted
7	Promote Services that Promote Self Sufficiency	2013	2017	Non-Housing Community Development	City Wide	Homeless/HIV/Aids	CDBG: \$352,516	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
8	Revitalize Target Neighborhoods	2013	2017	Non-Housing Community Development	Downtown Corridor/Business District Low and Moderate Census Tracts	Economic Development	CDBG: \$482,247	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted Businesses assisted: 100 Businesses Assisted
9	Increase Access for Homeownership	2013	2017	Affordable Housing	City Wide Low and Moderate Census Tracts	Homeless/HIV/Aids Rental Housing Owner Occupied Housing Economic Development	HOME: \$246,728	Direct Financial Assistance to Homebuyers: 15 Households Assisted
10	Special Needs Housing	2013	2017	Non-Homeless Special Needs	City Wide	Homeless/HIV/Aids Owner Occupied Housing	CDBG: \$279,302 HOME: \$119,600	Homeowner Housing Added: 2 Household Housing Unit

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Homelessness Prevention
	<b>Goal Description</b>	Maximize intervention which addresses activities and events to prevent neighborhood destabilization by stabilizing foreclosed properties and low income households at risk of foreclosure.
2	<b>Goal Name</b>	Preserving Existing Housing Stock
	<b>Goal Description</b>	Preserve existing affordable housing through government subsidized housing and unrestricted private units occupied by and affordable to low and moderate income households. Strategies 1) maintain, support and preserve the existing housing stock 2) prevent housing deterioration and vacancies 3) prevent neighborhood deterioration due to foreclosures and vacancies.
3	<b>Goal Name</b>	Increase Supply of Affordable Housing
	<b>Goal Description</b>	Produce affordable restricted housing with time restrictions that meet or exceed the required affordability periods. Increase overall availability of affordable permanent housing through new units and the rehab of vacant and deteriorated units.
4	<b>Goal Name</b>	Stabilize and Improve at Risk Neighborhoods
	<b>Goal Description</b>	Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting a well conceived balance between housing development, transportation, open space and recreation facilities, and commercial development.
5	<b>Goal Name</b>	Promote Economic Development
	<b>Goal Description</b>	Enhance the income of low and moderate income residents and provide jobs for the unemployed. Strategies: 1) develop neighborhood businesses 2) redevelopment of underutilized buildings especially downtown 3) support business and encourage efforts to retain and create jobs 4) improve parking and traffic patterns in core business areas 5) attract people to the downtown core.
6	<b>Goal Name</b>	Homeless and At-Risk of Homelessness Services
	<b>Goal Description</b>	Intervene in situations which can lead to homelessness such as foreclosures and develop permanent housing in place of temporary shelters. Strategies: 1) info and referral services to connect people at risk w/appropriate resources 2) provide training and services to enable the homeless to become self sufficient.

7	<b>Goal Name</b>	Promote Services that Promote Self Sufficiency
	<b>Goal Description</b>	Help to maintain good health and preserve independence. Strategies include: 1) enable success in school through a supportive learning environment 2) enable independence through programs provided by social service agencies.
8	<b>Goal Name</b>	Revitalize Target Neighborhoods
	<b>Goal Description</b>	Under the Rescue of Foreclosed Homes activity, the City of Brockton plans to acquire, rehabilitate and demolish properties in low and moderate income areas of the City. The City's efforts are to prevent neighborhoods from continued deterioration. The Brockton Redevelopment Authority, working with a variety of agencies throughout the City will work to rescue some of these properties and return them to productive use and occupancy. CDBG funds will be used to purchase and rehabilitate foreclosed single family homes which will be sold to low and moderate income families under existing First Time Homebuyer Programs. In the event a property is unable to be rehabilitated, the City will demolish the property to eliminate the concern for the health and safety of the residents that reside in those neighborhoods.
9	<b>Goal Name</b>	Increase Access for Homeownership
	<b>Goal Description</b>	Provide down payment assistance and closing cost assistance for 1st time home buyers purchase and rehab program assistance and housing counseling courses. Fair housing programs including affirmative fair marketing, outreach efforts and translation of vital documents.
10	<b>Goal Name</b>	Special Needs Housing
	<b>Goal Description</b>	Focus is on populations that have special needs which are rarely served by the private market. Strategies: 1) develop services 2) support housing programs 3) provide funding for adaptive rehabilitation of owner occupied single and 2 family homes.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

We estimate providing affordable housing to twenty households during the program year. Four of which will be renter households and sixteen will be homeowner units.

## AP-35 Projects – 91.220(d)

### Introduction

The general local consensus as revealed at various points in the continuing process of consultation is centered on constant themes.

- The need for a greater supply of affordable home ownership and rental housing units.
- While much has been done to increase the number of emergency shelters, supportive/transitional and ultimately permanent housing units for homeless individuals and families as well as special needs populations, substantial need remains among the lower income population in Brockton.
- Supportive social service needs remain high as Brockton's wide network of non profit agencies works hard to meet them.
- Revitalization and stabilization of target low and moderate income neighborhoods remains a very high priority.
- Modernization of aging infrastructure to support neighborhood stabilization and preservation is a constant need.
- Economic development efforts through several initiatives remains of significant importance to the City of Brockton.

#	Project Name
1	Howard Home
2	Community Housing Development Organization (CHDO)
3	First Time Homebuyer Assistance
4	Rental Development: Acquisition & Rehabilitation
5	HOME Administration
6	Father Bills & Mainspring: Montello "Welcome Home" Veterans Housing
7	Main Street Coordinator
8	Mobile Anti Crime Task Force
9	YMCA Cosgrove Swimming Pool
10	YMCA David Jon Louison Family Center
11	YMCA Camp Massasoit
12	Youth Enhancement Program
13	Brockton Area Multi Services Inc. (BAMSI) Helpline
14	Brockton Area Multi Services Inc. (BAMSI) Senior Center
15	Work Express Program
16	South Coastal Counties Legal Services
17	Homeowner Housing Rehabilitation Program
18	Economic Development
19	HUD Section 108 Interest

#	Project Name
20	City Parks
21	Rescue of Foreclosed Home
22	CDBG Administration
23	Public Services Program Delivery

**Table 7 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The basis for these allocation decisions lies in the ongoing consultations with the extensive network of public service agencies and public entities dealing with housing and community development issues in Brockton, public input from hearings and meetings, survey results and the experience of the lead agencies over many years.

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address the growing needs. Brockton's CDBG entitlement has decreased over the past couple of years and the entitlement amount for the FY2014 has decreased 2.3% in CDBG, the HOME funds has increased 4.4%. The decrease in CDBG has put a strain on the amount the City can provide for these projects. The pattern in recent years in terms of federal and state assistance to urban areas has generally been on the decline. With an emphasis on urban needs and on energy conservation assistance, Brockton is hopeful that this general trend has begun to reverse itself and that it will be better able to meet more of the housing and public service needs that continue to multiply in the city. As in other cities throughout the country, Brockton continues to face multiple and interrelated new housing and social problems stemming from subprime mortgages and foreclosures.

Throughout program year (FY2014) the City of Brockton will continue to work as it has done in the past to pursue partnerships with an extensive network of providers and programs at all levels of government and in the private sector will be working to craft and employ effective responses to this ongoing national housing crisis. Brockton will employ any and all new public and private mechanisms that become available which could further meet the underserved needs and it will continue to seek out creative local approaches to addressing these identified and prioritized needs

## Projects

### AP-38 Projects Summary

#### Project Summary Information

1	<b>Project Name</b>	Howard Home
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homelessness Prevention Increase Supply of Affordable Housing Special Needs Housing
	<b>Needs Addressed</b>	Homeless/HIV/Aids Rental Housing
	<b>Funding</b>	HOME: \$75,000
	<b>Description</b>	The adaptive re-use of the Howard Home located at the Brockton VA Medical Center to create 14 units of permanent, supportive housing for homeless veterans. The renovation of the building will be consistent with the National Park Service guidelines for a certified historic rehabilitation. The building will incorporate "Universal Design" components for increased accessibility and will comply with ADA requirements. The community will be energy star certified and incorporate Green Building components. The project will seek project based VASH rental assistance for 14 units and funding for a long term contract allowing a case manager to develop and oversee service plans for each resident. Other funding sources include federal and state historic tax credit equity, VA funds, DHCD Affordable Housing Trust funds, and private grants.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One family will benefit from the proposed activity.
	<b>Location Description</b>	On the property of the Brockton VA Medical Center located on Belmont Street.
	<b>Planned Activities</b>	

<b>2</b>	<b>Project Name</b>	Community Housing Development Organization (CHDO)
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock Increase Supply of Affordable Housing Stabilize and Improve at Risk Neighborhoods Increase Access for Homeownership
	<b>Needs Addressed</b>	Owner Occupied Housing
	<b>Funding</b>	HOME: \$292,128
	<b>Description</b>	City of Brockton certified Community Housing Development Organizations (CHDO) will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. Proceeds from the sale of the HOME-assisted housing activities will be returned to the local HOME Investment Trust Fund account to be used to benefit low/moderate income families.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The families that will benefit from this activity will be low and moderate income families.
	<b>Location Description</b>	This is yet to be determined
	<b>Planned Activities</b>	Acquisition and Rehabilitation of a property then sold to qualified family of low or moderate income.
<b>3</b>	<b>Project Name</b>	First Time Homebuyer Assistance
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Increase Supply of Affordable Housing Increase Access for Homeownership
	<b>Needs Addressed</b>	Owner Occupied Housing
	<b>Funding</b>	HOME: \$135,000

	<b>Description</b>	HOME funds to provide down payment assistance, and reasonable closing costs for eligible low and moderate income home buyers citywide. All home buyers assisted under this program are required to complete home buyer counseling courses. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received. Generally down payment assistance will be limited to \$9,000.00 per single family home.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that fifteen persons will be assisted through the use of these funds. Those benefiting will be of low and moderate income.
	<b>Location Description</b>	This project would be for properties located throughout the city of Brockton.
	<b>Planned Activities</b>	Work with low and moderate income families that are in need of assistance when trying to purchase a home. Qualified individuals will be provided with up to \$9,000.00 of assistance.
<b>4</b>	<b>Project Name</b>	Rental Development: Acquisition & Rehabilitation
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock
	<b>Needs Addressed</b>	Rental Housing
	<b>Funding</b>	HOME: \$100,000
	<b>Description</b>	Developers will utilize HOME funds to acquire and/or rehabilitate multi-family housing projects as either additional affordable housing opportunities in Brockton or to ensure current affordable housing projects remain affordable for the foreseeable future. These projects will require substantial rehabilitation. HOME funds will be used to leverage other public and private funds.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low income families that are seeking rental properties.
	<b>Location Description</b>	

	<b>Planned Activities</b>	Developers will utilize HOME funds to acquire and/or rehabilitate multi-family housing projects as either additional affordable housing opportunities in Brockton or to ensure current affordable housing projects remain affordable for the foreseeable future. These projects will require substantial rehabilitation. HOME funds will be used to leverage other public and private funds.
5	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock Homelessness Prevention Increase Supply of Affordable Housing Stabilize and Improve at Risk Neighborhoods Special Needs Housing Increase Access for Homeownership
	<b>Needs Addressed</b>	Homeless/HIV/Aids Rental Housing Owner Occupied Housing
	<b>Funding</b>	HOME: \$44,600
	<b>Description</b>	The Brockton Housing Authority utilizes these funds for coordination oversight, implementation and compliance as it carries out the eligible HOME activities identified in the One Year Action Plan
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	To oversee the rehabilitation and new construction of the homes and document through IDIS all of these activities.
6	<b>Project Name</b>	Father Bills & Mainspring: Montello "Welcome Home" Veterans Housing
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homelessness Prevention
	<b>Needs Addressed</b>	Homeless/HIV/Aids

	<b>Funding</b>	HOME: \$25,000
	<b>Description</b>	Father Bills & Mainspring: Montello Welcome Home will create 22 new supportive housing units within two buildings - a 20 unit building and a duplex. The populations to be served include: 2 units for homeless families, 10 units for homeless U.S. Veterans and 9 units for chronically homeless adults. All but one of the units will be reserved for extremely low income homeless households with one unit for a very low income resident manager. Project based rental subsidies have been committed by the Department of Housing and Community Development.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The population to be served includes two (2) units for homeless families, ten (10) units for homeless veterans and nine (9) units for chronically homeless adults.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Creation of 22 new supportive housing units within two buildings. (One building will be a twenty unit complex and the other a duplex)
7	<b>Project Name</b>	Main Street Coordinator
	<b>Target Area</b>	Downtown - Main Street Downtown Corridor/Business District
	<b>Goals Supported</b>	Promote Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$27,500
	<b>Description</b>	The coordinator will provide an analysis and developmental revitalization strategies and recommendations to the appropriate official and advisory bodies within the City of Brockton. Responsibilities include the development, conduct, execution and documentation of the Main Street Program and related public events. This on site position is responsible for coordinating all project activities locally as well as representing the community. The objective is to revitalize the downtown corridor of the city while providing jobs through economic development.
	<b>Target Date</b>	6/30/2015

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The target audience is the entire City of Brockton. Through this program, the intent is to start at the heart of the City with a much needed makeover. A plan will be put into action as a coordinated effort between the City of Brockton, The Brockton 21st Century Corporation and the Brockton Redevelopment Authority to provide Main Street businesses with resources that will enhance their business. The initial boundaries of the program will consist of the entire Main Street Corridor.
	<b>Location Description</b>	The location is the main corridor of the downtown. (Main Street)
	<b>Planned Activities</b>	The Main Street Coordinator will work closely with existing businesses, private contractors, development of strong and productive working relationships with appropriate public agencies at the local and state levels and productive working relationships with media sources to disseminate program information to the general public.
<b>8</b>	<b>Project Name</b>	Mobile Anti Crime Task Force
	<b>Target Area</b>	Census tract 5104, 5108, 5109, 5114 Low and Moderate Census Tracts
	<b>Goals Supported</b>	Stabilize and Improve at Risk Neighborhoods
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$125,263
	<b>Description</b>	The 2014 plan will change from previous years to include four rapid response officers who will be assigned to patrol all of the low and moderate income census tracts in the City of Brockton, instead of the four downtown census tracts. As in the previous years, the objective is to have these officers patrol these areas during the high crime hours (between the hours of 4:00pm and midnight). The officers will continue to report to the Brockton Redevelopment Authority with regard to their locations during the high crime hours and weekly police reports will be provided to the BRA.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Because this program has increased the number of census tracts (all of the low and moderate income tracts in the city), it is estimated that approximately 70,000 persons will benefit from the activity. The majority of the families will be of low and moderate income residents.

	<b>Location Description</b>	All of the low and moderate income census tracts within the City of Brockton. In addition to patrolling these census tracts during the high crime hours, it is anticipated that these officers will become very familiar with the residents within the assigned areas and therefore the hope is that fighting crime will be an easier task because of their knowledge and familiarization of the assigned areas.
	<b>Planned Activities</b>	Patrol the low and moderate census tracts within the high crime hours. Become familiar with areas that are prone to crime and focus more so in these areas.
<b>9</b>	<b>Project Name</b>	YMCA Cosgrove Swimming Pool
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Stabilize and Improve at Risk Neighborhoods Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$50,213
	<b>Description</b>	The Cosgrove Pool is a program for children and youth and although it is open to all citizens in the City, it is designed for low and moderate income residents of the City of Brockton. The program provides recreational activities for youth that will keep them away from the dangers of drugs, gangs and other such activities. It is estimated that over 1,100 individuals will take advantage of this program during the summer months. The area to be served is the entire City of Brockton. All activities of the sub recipient shall benefit Brockton residents of low and moderate income as identified by the U. S. Department of Housing and Urban Development.
	<b>Target Date</b>	8/29/2014
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 1,100 people will benefit from the use of the pool. Most of the people that will benefit from the use of the pool will be from low and moderate income families.
	<b>Location Description</b>	The pool is centrally located and is easily reached by most any citizen through the use of public transportation. Many of the citizens are within walking distance from the pool and are in low and moderate census tracts.
	<b>Planned Activities</b>	Lifeguards and staff will provide recreational activities for the children who attend the pool as well as instructional activities to focusing on water safety.
<b>10</b>	<b>Project Name</b>	YMCA David Jon Louison Family Center

	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homeless and At-Risk of Homelessness Services Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Homeless/HIV/Aids Public Services
	<b>Funding</b>	CDBG: \$4,000
	<b>Description</b>	The David Jon Louison Family Center serves 19 families, (approximately 19 women and 47 Children). This program is open to all persons who are low and moderate income. The families served by the David Jon Louison Family Center are experiencing homelessness, are at an extremely vulnerable time in their lives, especially the children. The goal of the center is to assist families through the crisis of homelessness, while providing services that promote a successful transition towards rapid rehousing and overall enhanced self sufficiency. The Center offers temporary emergency shelter as well as an array of support services including individualized case management, mental health services, educational opportunities, employment skills and any other support families need in order to become self sufficient.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The families that arrive at the David Jon Louison Family Center are either homeless or are at risk of becoming homeless. Over twenty families will benefit from the proposed activity (25-30 children depending on family size).
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding will provide a portion of a Case Worker who will work with the families staying at the shelter. The Caseworkers provide a wrap-around service for these families including free YMCA membership which includes all YMCA programs including summer camp, child care, fitness, mentoring, mental health services, youth programming, etc. As a development program, the families are included in weekly support groups, house meetings, community service projects, family dinners, social skill building groups, financial literacy, and positive recreational leisure activities. The ultimate goal of the program is to promote self sufficiency to allow these families to live on their own.
<b>11</b>	<b>Project Name</b>	YMCA Camp Massasoit
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Promote Services that Promote Self Sufficiency

	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$4,000
	<b>Description</b>	Camp Massasoit is an organized day camp that provides summer recreational outlets for children who live in neighborhoods with elevated crime activities. The main goal is to foster the attainment of developmental assets, provide a camping experience that captures the interest and enthusiasm of urban youth and provide a positive opportunity in recreation and social interaction as well as leisure activities for the benefit of low and moderate income children between the ages of 9 and 12. The mission of the camp is to provide development of these children in the areas of: * Values Orientation* Health and Fitness* Self Esteem and confidence* Appreciation of ethnic and cultural diversity* Increased problem solving* Providing a positive human relationship that ensures consistency and caring relationships between youth and adults and with their peers.
	<b>Target Date</b>	8/29/2014
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Camp will provide the opportunity for 100 children from low and moderate income families to participate in a summer enrichment camp program. The children attending the camp are selected by the schools in which they attend based upon the income of the household. There is a registration process by which income is a key factor. Once the schools select the children (4th and 5th graders) the schools then provide this information to the YMCA.
	<b>Location Description</b>	Camp Massasoit is located on Massasoit Community College grounds - 1 Massasoit Blvd. Brockton, MA 02302.
	<b>Planned Activities</b>	Planned activities at the Camp are mainly focused on opportunities for children to explore their unique talents and positive interests allowing them to reach their full potential. In addition to recreational activities, staff members provide activities that foster development of the children. Social interaction, education, health and fitness, self esteem and confidence, appreciation of ethnic and cultural diversity and increased problem solving skills. All of these activities lend themselves well to a positive and consistently caring individual.
<b>12</b>	<b>Project Name</b>	Youth Enhancement Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Public Services

	<b>Funding</b>	CDBG: \$4,000
	<b>Description</b>	The Associacao Cabo Verdiana de Brockton organization utilizes CDBG funding to partially support the salary of a full time coordinator for their Youth Enhancement Program (YEP). The coordinator provides assistance in the Cape Verdean de Brockton's continued efforts to outreach and assist youth in the City of Brockton. The Youth Coordinator is responsible for overseeing the youth programs and community outreach as well as conducting training sessions for mentors and volunteers. This after school program is a responsive, goal oriented community project that is aimed at an environment of cultural and linguistic compatibility.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An average of 75 children will benefit from the Youth Enhancement Program. However, indirectly the Cape Verdean Association will serve between 50 and 80 English as a second Language students, 500 to 1,000 families will be served with Consular services and social services will be provided to at least 500 individuals/families.
	<b>Location Description</b>	The Associacao Caboverdiana de Brockton Inc. is located at 575 N. Montello Street, Brockton, MA 02302.
	<b>Planned Activities</b>	An after school program is designed to assist children with their homework as well as after school activities to assure they are being taken care of and away from the lures of gang violence and drugs. Additionally, a summer camp consists of five weeks during the summer months which provides these children with summer recreational and fun activities.
<b>13</b>	<b>Project Name</b>	Brockton Area Multi Services Inc. (BAMSI) Helpline
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homelessness Prevention Homeless and At-Risk of Homelessness Services Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$4,000

	<b>Description</b>	Helpline is a program operated by Brockton Area Multi Services Inc., the local anti poverty umbrella organization serving the City of Brockton and surrounding areas. Helpline is an informational and referral resource that has for the past several years helped thousands of Brockton residents to locate services and assistance for a variety of needs. CDBG funds will be used to partially pay the salary of the full time position for the Homeless Prevention program that will assist low income households who are facing severe financial hardship which may jeopardize their housing.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The program will assist approximately 1,200 individuals through its emergency services program that helps low income households in Brockton who are facing severe financial hardships which may jeopardize their housing.
	<b>Location Description</b>	The Bamsi Helpline Center is located at 440 Belmont Street, Brockton, MA 02301. The telephone support is provided to all residents of Brockton.
	<b>Planned Activities</b>	The main activity of Helpline is to direct low income families or individuals to the appropriate resources within the city that can assist in a specific problem facing that resident. The types of services range from foreclosure and job loss to residents who are unable to pay their rent or utilities. Funding provides BAMSI with partial salary of a staff worker who directs the callers to the appropriate resource.
<b>14</b>	<b>Project Name</b>	Brockton Area Multi Services Inc. (BAMSI) Senior Center
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Promote Services that Promote Self Sufficiency Special Needs Housing
	<b>Needs Addressed</b>	Non Homeless Special Needs Public Services
	<b>Funding</b>	CDBG: \$4,000
	<b>Description</b>	Located in the Campello High Rise complex with three other strategically located buildings in the city, the Dorn Davies Senior Center provides a variety of programs and services that serve the needs of senior citizens in Brockton. These services include but are not limited to Health welfare, social programs, educational programs, counseling services, support groups and a nutritional program that provides groceries to elderly low and moderate income senior citizens.
	<b>Target Date</b>	6/30/2015

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 3,300 elderly persons will be assisted through the use of this program. The elderly population in the City of Brockton indicates that nearly 6% are institutionalized, 15,252 are age 60 or above and are living in the community, 20% live with a family or spouse and 80 percent live alone. The outreach program reaches out to those elderly who are living alone, yet the program is open to all of the elderly living in the City.
	<b>Location Description</b>	The program will be conducted at the public housing complex located at 1380 Main Street, Brockton, MA 02301.
	<b>Planned Activities</b>	Activities include a nutrition program, the Brown Bag Program, Health Counseling, Social Activities, Vision support and an Alzheimer's Caregiver Support Group among many other services provided by the center.
<b>15</b>	<b>Project Name</b>	Work Express Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homelessness Prevention Promote Economic Development Homeless and At-Risk of Homelessness Services Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Homeless/HIV/Aids Public Services
	<b>Funding</b>	CDBG: \$7,000
	<b>Description</b>	Father Bill's and Mainspring operates the Work Express Program that is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of a program coordinator who oversees the work express program.
	<b>Target Date</b>	6/30/2015

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Father Bill's and Mainspring operates the Work Express Program that is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of a program coordinator who oversees the work express program.
	<b>Location Description</b>	Father Bill's and Mainspring Inc. operates out of 430 Belmont Street, Brockton, MA 02301. The Work Express Program is a City Wide program that works with individuals who are homeless. Shelter is provided along with training that is essential for these individuals in order to re-enter the work force and become self sufficient.
	<b>Planned Activities</b>	The work express program is a supervised program that provides work to homeless people. Father Bill's and Mainspring Inc. also provides a variety of program offerings for homeless, all of which are geared toward self sufficiency of the individuals involved.
<b>16</b>	<b>Project Name</b>	South Coastal Counties Legal Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Homelessness Prevention Homeless and At-Risk of Homelessness Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$4,000
	<b>Description</b>	South Coastal Counties Legal Services provides legal services to low and moderate income residents of the City of Brockton. The Brockton Housing Law program will represent clients facing lockouts, evictions, housing discrimination, utility shut offs and poor housing conditions. CDBG funds will be used to fund a portion of the costs associated with hiring of a housing attorney.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Over 100 very low- or low-income Brockton residents will be assisted to improve bad conditions and stabilize their housing via the Housing Court or negotiated settlements with private property owners. Between 50 to 200 tenants will be educated on their legal rights to clean and safe housing through the State's Sanitation Code and the multiple ways they can get violations corrected

	<b>Location Description</b>	The Justice Center of Southeast Massachusetts is located at 231 Main Street, Suite 201, Brockton, MA 02301
	<b>Planned Activities</b>	
<b>17</b>	<b>Project Name</b>	Homeowner Housing Rehabilitation Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock Stabilize and Improve at Risk Neighborhoods Promote Economic Development
	<b>Needs Addressed</b>	Owner Occupied Housing Economic Development
	<b>Funding</b>	CDBG: \$280,000
	<b>Description</b>	The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000.00 per household unless approved by the Executive Director. Lead Paint removal and energy efficiency costs may exceed this amount. For single family home owners or two family owner occupied homes, this is an interest free loan for residents who meet the U. S. Department of Housing and Urban Development income guidelines. A lien will be placed on the property, and should the owner refinance, transfer ownership or in the case of death, the total amount of the loan must be paid back in full.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Based upon the application process of the Brockton Redevelopment Authority and the U. S. Department of Housing and Urban Development's income guidelines, the families that benefit from this program are all low and moderate income households. It is estimated that at least 10 households will be assisted during this year.
	<b>Location Description</b>	The activity is City wide.
	<b>Planned Activities</b>	Assist eligible homeowners with repairs to their homes that they would not be able to afford. From the application process to the final inspection of the property upon completion of the work are all part of the planned activities of this program.
<b>18</b>	<b>Project Name</b>	Economic Development

	<b>Target Area</b>	Downtown - Main Street
	<b>Goals Supported</b>	Promote Econcomic Development Revitalize Target Neighborhoods
	<b>Needs Addressed</b>	Infrastructure Economic Development
	<b>Funding</b>	CDBG: \$181,077.45
	<b>Description</b>	The Brockton Redevelopment Authority acting in conjunction with the City of Brockton and the Department of Public Works complete sidewalk and streetscape improvements at Railroad Avenue. Improvements are intended to create a more suitable living environment for the residents of a predominately low and moderate income city. The improvements will serve a large segment of the population, support the needs of residents and have a direct impact on various neighborhoods. The Brockton Redevelopment Authority will continue to provide assistance to business owners with the Facade Improvement Program.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Residents around the project site will benefit from the streetscapes activity.
	<b>Location Description</b>	The street improvement will complete the section on Railroad Avenue, by the Lincoln Street intersection.
	<b>Planned Activities</b>	1. Street and sidewalk re-paving, street lighting and handicap accessibility will be part of the improvements under Streetscapes activity. 2. Four new commercial facade improvement projects is planned for FY2014 under the Facade Improvement Program activity.
<b>19</b>	<b>Project Name</b>	HUD Section 108 Interest
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Promote Econcomic Development Revitalize Target Neighborhoods
	<b>Needs Addressed</b>	Infrastructure Economic Development

	<b>Funding</b>	CDBG: \$156,945
	<b>Description</b>	During 2014, the Brockton Redevelopment Authority will provide its second payment (other than interest) for the Section 108 Loan of \$2,600,000.00 which was awarded by HUD for the rehabilitation of the Adams Street Garage, BRA's economic development loans to Brockton businesses and the Receivership Program for acquisition and rehabilitation.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The rehabilitation of the Adams Street Garage will benefit and citizen of the City of Brockton.
	<b>Location Description</b>	This is the Section 108 Loan received from HUD. At this time the only project that is in process is the Adams Street garage. The amount of funding applied to the rehabilitation of the garage was \$1.6 million.
	<b>Planned Activities</b>	Rehabilitation of the Adams street garage. The garage required numerous repairs including replacement of stairs, storm drains, resealing of floors, etc. - Most of the work has been completed. The City of Brockton is currently in the process of accepting bids for a security system (including cameras) for the exterior of the property. The Brockton Parking Authority plan to renovate handicap accessible ramps around the Adams Street Garage in summer 2014.
<b>20</b>	<b>Project Name</b>	City Parks
	<b>Target Area</b>	Downtown - Main Street City Wide
	<b>Goals Supported</b>	Promote Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$210,287
	<b>Description</b>	The Brockton Redevelopment Authority will work with the Brockton Parks Department for renovation of public parks and playgrounds, using CDBG as a leverage for state grants. Handicap accessibility will be provided to a number of public parks and playgrounds throughout the City of Brockton. A portion of CDBG funding will be allocated to City Hall Plaza renovation, that is expected to begin in May 2014.
	<b>Target Date</b>	6/30/2016

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	The Mulberry Street Park is located on Mulberry Street, the south central side of the City of Brockton. The city hall plaza is located in the center of the City of Brockton, just behind 45 School Street (City Hall), Brockton, MA 02301.
	<b>Planned Activities</b>	There are three activities planned under the City Parks Project. First, a match of \$25,000 CDBG funding will be provided to leverage a renovation of Mulberry Street Park for a total cost of approximately \$150,000. The remaining project funding will be provided by the Energy and Environmental Affairs department through the Our Common Backyards Grant. The renovation will include removal of old equipment and installation of single unit children play area with poured in place rubber surface; repavement of basketball court and new basketball pole and hoop; new site furniture and benches. Second, a match of \$174,000 CDBG funding will be provided to renovate the Brockton city hall plaza. Currently City Hall Plaza is in a run down condition and requires extensive repair to bring it up to standards. The project will address three downtown priorities: a. Making Brockton's most important civic building more inviting, b. Repair dilapidated plaza features and c. establish a central public space that is able to host a variety of large civic events. The Brockton Redevelopment Authority is working closely with the City of Brockton Planning Department to administer the project. Third, The Brockton Redevelopment Authority will work with the Brockton Parks Department for increasing handicap accessibility to a number of public parks and playgrounds throughout the City of Brockton.
<b>21</b>	<b>Project Name</b>	Rescue of Foreclosed Home
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock Stabilize and Improve at Risk Neighborhoods
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$90,000

	<b>Description</b>	In an effort to prevent the number of foreclosures in Brockton from decreasing the supply of affordable housing and from destabilizing neighborhoods through the presence of deteriorating vacant homes, the Brockton Redevelopment Authority is working with various agencies throughout the city to rescue some of these properties and return them to productive use and occupancy by low and moderate income families. CDBG funds will be used to acquire and rehabilitate foreclosed single family homes which will be resold to low and moderate income families under existing First Time Homebuyer Programs. Additionally funds may be used to demolish property that is beyond repair in an effort to stabilize the neighborhoods in which the property is located.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Due to the limitation of funds, the Brockton Redevelopment Authority will only rehabilitate one property this year under this program. The CDBG funding will be used to acquire and rehabilitate one property. Due to the amount CDBG of funding available, the BRA will work with the Receivership Program and private developers in an effort to complete this project. The rehabilitated property will be sold to an eligible first time homebuyer.
	<b>Location Description</b>	The BRA will select a property that has been vacant for rehabilitation from within the City of Brockton.
	<b>Planned Activities</b>	Acquisition and Rehabilitation of one property in the city.
<b>22</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserving Existing Housing Stock Homelessness Prevention Stabilize and Improve at Risk Neighborhoods Promote Economic Development Homeless and At-Risk of Homelessness Services Promote Services that Promote Self Sufficiency Special Needs Housing Revitalize Target Neighborhoods

	<b>Needs Addressed</b>	Homeless/HIV/Aids Non Homeless Special Needs Owner Occupied Housing Infrastructure Economic Development Public Services
	<b>Funding</b>	CDBG: \$290,997
	<b>Description</b>	The Brockton Redevelopment Authority will utilize CDBG funds for coordination oversight, implementation and compliance as it carries out the eligible CDBG activities identified in the annual action plan.
	<b>Target Date</b>	6/30/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	The Brockton Redevelopment Authority is located at 50 School Street, Brockton, MA 02301
	<b>Planned Activities</b>	
23	<b>Project Name</b>	Public Services Program Delivery
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Promote Services that Promote Self Sufficiency
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$11,700.95
	<b>Description</b>	This funding source is from FY2014 program income, with 15% taken out for BRA staff program delivery for public service activities.
	<b>Target Date</b>	6/30/2015

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The priorities for allocating investments geographically were based on the locations of low- and moderate-income households or persons being targeted. The service/geographic areas of many of the City's housing and homeless projects are city-wide because they are targeted to meet the needs of low- and moderate-income households and persons throughout the City. The same is true for certain public services, such as the WorkExpress program that assist homeless people finding shelter and jobs across Brockton. In addition, part of the City's CDBG funds will be used for several public service programs for many groups that are presumed to have low to moderate income. They include programs for seniors and homeless individuals.

## **Rationale for the priorities for allocating investments geographically**

The City of Brockton is not allocating percentages of funds for specific geographic locations within the City with the exception of the Brockton Police Mobile Anti Crime Patrols which are specifically for the low-moderate income census tracts.

The target neighborhoods indicated below are all within low and moderate income census tracts.

**Downtown Core** – Census Tract 5109 had 79% of the households listed in the ACS as low and moderate income. This neighborhood is in the very core of the city. This area is a high crime area and is patrolled by the specially equipped Brockton Police Anti Crime Unit.

Other neighborhoods that are low and moderate income, although not having funds designated for them by percentage, are being constantly considered for improvements by many of the programs and activities of the CDBG funding. The other low and moderate income census tracts in the city are as follows:

**Highland, Newbury and Green Street Neighborhoods** – Census Tract 5108 has 61% of the households listed in the 2010 Census as low and moderate income. The City has made great strides in this area relative to home acquisitions and renovations. Although there is still much to do, the City has committed to completing projects by way of renovations to vacant or abandoned properties to bring them to habitable condition and demolitions of properties that are beyond repair.

**Montello Neighborhood** – There are two low and moderate income census tracts with this neighborhood, census tract 5105-02 and 5103. The City of Brockton and the Brockton Redevelopment Authority will assist homeowners in these census tracts with repairs to their homes and will concentrate on vacant or abandoned properties within these areas.

**The Village** – Census Tract 5110 is within this neighborhood and is made up of 65% low and moderate income residents.

**Campello Neighborhood** – Census tract 5114 and 5116 are within the Campello Neighborhood and has 52% of its residents low and moderate income in tract 5114 and 51% in Census Tract 5116.

**East Side Neighborhood** – Census Tract 5112 has 52% of the residents listed as low and moderate income.

**Pleasant/Prospect Neighborhood** is within census tract 5104 and has over 52% of its residents listed as low and moderate income households.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

There are a number of services and programs which will assist the achievement of the housing goals. Listed below are the programs that will assist in providing affordable housing to families in the City of Brockton. New rental construction, Howard Home will provide 14 units of permanent, supportive housing for homeless veterans, and Father Bills & Mainspring's Montello "Welcome Home" Veterans Housing will provide 22 new supportive housing units, and the Rescue of Foreclosed Homes activity for rehabilitation and sale of one home in the City for a trained and qualified homeowner.

One Year Goals for the Number of Households to be Supported	
Homeless	1
Non-Homeless	0
Special-Needs	0
Total	1

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	2
Acquisition of Existing Units	16
Total	20

**Table 9 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The City has severely limited resources due to the cuts in the CDBG and HOME programs. Brockton must create neighborhoods that are financially viable for those who inhabit them. The Brockton Housing Authority will continue to create accessible units through its public housing and affordable housing programs to meet current need.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Brockton Housing Authority (BHA) manages over 2000 apartments in 16 public housing developments throughout Brockton as well as 1000 rent-assisted apartments/houses. The approximately 85 employees of the BHA serve about 7,000 residents, or about 7% of Brockton's population. The Authority also manage programs to help develop affordable private homes for ownership and rental that enable families to move beyond public assistance and become self-sufficient. The BHA currently has list for public housing and the Housing Choice Voucher programs that are in excess of 5 years long.

### **Actions planned during the next year to address the needs to public housing**

- Continue comprehensive renovations at 24-7 Caffrey Towers, to include exterior façade repairs/waterproofing, and additional unit renovations,
- Evaluate energy efficient upgrades to the new federal developments, 24-9 Roosevelt Heights, and 24-10 Belair High-Rise,
- Plan for a complete physical needs assessment, to include green initiatives for all federal developments,
- Begin UFAS accessible upgrades within the common areas of federal developments,
- Fire alarm panel, and system upgrade at 24-3 Manning Tower,
- Complete installation of GFI receptacles at state development 667-4 Crosby Gardens,
- Complete Comprehensive Modernization of kitchens and bathrooms in thirty-six (36) at 200-2 Washburn Heights,
- Continue roof replacements, and begin window replacement at 705-1 Walnut – Crowell.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Resident Service Department, in collaboration with the Resident Advisory Board, continues to work together to provide leadership to the residents of the Brockton Housing Authority. Leadership training for tenant leader continues. The purpose is to give voice to BHA resident leaders and assist them to take a contributing position in the organization and management of our 2000 residents.

The organization of Tenant Councils grows stronger and Residents are taking more responsibility for the activities and direction of our residents. A strong leadership team has created a variety of programs that are able to reach out to as many residents as possible to teach, enrich and to brighten their lives. It is an excellent example of self-determination based on a beneficial collaboration.

Many initiatives have been instituted, connecting with the local Council on Aging which sponsors many interesting programs and opportunities. Twice a month RAB meetings are held. They meet at different locations in order to include more residents in the discussion. We are at the beginning of our Resident Interpreter Program. Five of our multi-lingual speakers have signed up to volunteer to assist residents who need translation assistance in understanding the responsibilities of the lease and other issues that may arise with in the development. The flowers and tomatoes will bloom again this year and the distribution and implementation of the program will be tenant organized and run with the support of Housing Authority staff.

The Family Self Sufficiency Program works diligently to sign up more residents, refer them to educational opportunities, help them with financial literacy, open up the possibilities of home ownership and raise their feelings of self worth. 44 homeowners , six small business owners, and countless students are participating and making the most of learning and growing intellectually.

Our partnership grows stronger and has a more positive impact on both our residents, and the staff of the Brockton Housing Authority.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Public Housing Authority is not troubled.

**Discussion**

The BHA continues to seek additional resources to assist in the modernization of its existing public housing stock and to work with partners to develop livable neighborhoods. The BHA recently executed an energy performance contract that allowed the BHA to borrow \$5.8 million dollars to install energy savings devices within its public housing stock. These include new refrigerators, lighting, toilets and shower heads, and windows and doors at its 400 unit elderly-disabled complex. There is substantial change proposed in the delivery of public housing in the Commonwealth of Massachusetts that could cause significant change in the way public housing is governed and managed.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Brockton and Father Bill's and Mainspring would like to partner with community entities to outreach and engage the unsheltered homeless community and would like to prioritize this group for possible housing subsidies through the Brockton Housing Authority. Additionally, the development of one resource/opportunity center with community partners would be an ideal method for assessing the individual needs of those who are homeless or are in danger of becoming homeless. The City would also like to participate in the community run groups to identify chronic people living on the street and provide targeted outreach and housing resources.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

In addressing the needs of the chronically homeless, there is a multi-pronged approach; prevention, aggressive outreach, assessment and case management, mainstreaming benefits and resources and housing. Housing must be linked to stabilization and community-based services that will ensure successful tenancies. The strategies identified are central to the focus of addressing chronic homelessness. Chronically homeless individuals are likely to also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25 percent of the homeless suffer from mental illness and that 60 percent of homeless individuals are drug dependent. Permanent supportive housing is a high priority for the chronically homeless population. In accordance with the identified needs in Brockton, housing for the chronically homeless is a priority.

The City has several goals to reduce and end homelessness, the first is to re-establish proactive street outreach resources targeted to chronically homeless men and women living on the streets of Brockton and integrated into existing community planning and engagement initiatives as appropriate. Another is to develop a community day resource and opportunity center, including co-location of community resources, to provide a "one stop shop" for homeless men and women. The City would also like to establish a specific list of homeless individuals in the community and use this list as a target outreach, engagement, and housing resources. Develop and distribute a resource guide/street sheet for the community, including homeless individuals.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Father Bill's and Mainspring and the Brockton Redevelopment Authority will continue to work together to shelter individuals and families with the goal of additional permanent housing resources internally

and externally. They will also collect data and analyze it in addition to getting provider and consumer input. The Old Colony Y David Jon Louison Family Center will provide transitional housing for families, in addition to an array of support services including individualized case management, mental health services, educational opportunities, employment skills, and any other supports families need in order to become more self-sufficient. The David Jon Louison Center provides 24-hour staff with case managers, and over 100 people will be serviced in FY2014. Father Bills and MainSpring operates emergency shelter for adult individuals age 18 and up. Guests receive triage case management, nutritious meals, health services with on-site clinics, bath and laundry facilities, and personal items.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Father Bill's and Mainspring would like to seek collaboration within the community to help at least 10 chronically homeless individuals/families move into homes each year for the next five years, totaling 50 units and 50 individuals/families. Father Bill's and Mainspring would also like to continue to develop family housing and housing for veterans in the community with the goal of ending veteran homelessness by 2015.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Father Bill's and Mainspring provides data to the interagency council on Housing and Homelessness on discharges that come to the facilities to better coordinate and communicate with state and other systems of care.

## **Discussion**

Helping homeless individuals and families is and will continue to be a challenge in Brockton. The solution to this problem will entail a collaborative and multi-pronged effort including the creation of jobs in Brockton for Brockton residents and affordable housing opportunities, along with services for those with mental health and substance abuse challenges, and assistance for persons with disabilities. Only by tracking all of these challenges in a collaborative manner will the City end homelessness.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

There is a state law that requires local government to have at least 10% of its housing stock subsidized and dedicated to households below 80% median income in order to retain full control over the zoning permit process when affordable units are proposed. That nature of affordability is defined by the state and generally must be for at least 15 years for rehabbed housing units and 30 years for newly created units. This law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by laws or other arguments such as impact on schools, environmental issues, infrastructure limitations, etc. A local community can amend its bylaws and procedures for a specific project and gain exemption from this law under what is known as Chapter 40B and controlled by state regulations. Limited public funding and private investment interest are remaining key barriers to increasing the supply of affordable housing.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Brockton's current Zoning Ordinances are one of the greatest impediments to the creation of affordable housing and private investment in residential projects. The city's zoning map has not seen a major update in several decades. Large areas of the City are zoned for single family residential homes. Many of the other areas which are zoned for multifamily are fully developed. Most of the parcels in the R-2 and R-3 zones are built out. Vacant parcels are usually small undersized parcels and those which are buildable are affected by current market conditions which do not support the development of new housing. Other areas of the city where it would be appropriate to change zoning to allow for multifamily development and mixed use developments are currently zoned for commercial use only. The city's planning capacity is severely limited which creates limitations on the ability to write and pass zoning amendments. Major zoning amendments of the type necessary to allow for the creation of significant new multifamily housing developments usually need to be supported by a comprehensive planning study in order to receive political support for passage.

In addition the creation of significant large scale housing development which contains a large number of affordable units is politically hard to support locally. The City already contains more than the State mandated permanently restricted affordable housing. Currently 12.6% of the City's housing stock is permanently restricted as affordable housing which exceeds the State Goal of 10%. The city is seeking mixed income projects in the downtown to spur economic growth and bring back the vitality to the area. If this effort is successful as it has been in other gateway cities this plan could be applied to other traditional commercial centers of the city. This would allow the city to expand the number of affordable units but within a context of larger number of market rate units and within mixed use developments.

The Redevelopment authority will also continue its current policy of creating affordable units within small multifamily dwellings needing renovation, usually two or three family homes, which will be renovated with CDBG funds.

## **Discussion**

Other strategies which can be looked at in the coming years are:

**Zoning Relief and Other Bonuses** – State and case law permits local jurisdictions to provide a variety of benefits for developers, such as a density bonus in exchange for reserving a percentage of housing units for low and moderate income (inclusionary zoning) or senior households for a specified period of time.

**Inclusionary Housing** – Inclusionary zoning has become a more common tool for communities and is usually linked to the bonuses mentioned above. In strong housing markets, it is feasible for developers to meet the inclusionary zoning requirements without other subsidies. In a market such as Brockton's, subsidies would be essential.

**Commercial/Industrial Linkage Fee** – The concept is that most commercial and industrial development relies on a number of employees who are paid less than 80% of median income. So, by requiring some effort to provide funds to enable these employees to live as well as work in the community by putting the money towards affordable housing developments in the community, the linkage fee is a benefit to all.

**Availability of Financing** – Some communities have developed task forces which work with lenders operating in the community to develop agreements in conjunction with the Federal Community Reinvestment Act, which will provide lower mortgage rates and other financial benefits for providers and consumers of affordable housing.

**Accessory Apartments** – Many communities have developed accessory apartment provisions in the zoning code, which in effect permit homeowners, especially single family homeowners, to provide an additional housing unit either within the existing house or as an addition, provided that one of the households meets the eligible income limit. This code provision has the added benefits of legalizing a number of illegal uses and also of developing housing in communities with little or no land availability.

**GAP Financing and Fee Reductions** – Many communities use HOME funds, redevelopment set aside funds, and Housing Trust Funds to provide 'gap financing' for affordable housing projects in order to mitigate the impacts of market factors, planning and development fees, on-site and off-site improvements, infrastructure and utility connection and other costs associated with residential development.

**Permit Processing** – A community can set up an expedited processing system for any project which is providing affordable housing. This program establishes an aggressive processing timeline to cut the cost

and time constraints associated with building affordable housing by:

1. Providing mandatory preliminary review meetings for early staff feedbackSignificantly reducing project review cyclesFunding environmental, traffic impact and other studies after preliminary reviews

Compounding the need for affordable housing has been the loss of many units due to foreclosure. While these were not necessarily owned or occupied by households below 80% median income, it is reasonable to assume that a number of them were within that bracket.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address growing needs. Brockton's entitlement amounts for CDBG and HOME as well as other federal and state assistance to urban areas have been on a downward trend over the past few years. With new emphasis on urban needs and on energy conservation assistance, Brockton is hopeful that this general direction has begun to be reversed and that it will be better able to meet more of the housing and public service needs that continue to grow exponentially. As in other cities throughout the country, Brockton continues to face multiple and interrelated new housing and social problems stemming from the sub-prime mortgage/foreclosure crisis. Brockton has the highest levels of foreclosure distress as of January 1, 2013, both among the gateway city communities and all Massachusetts municipalities.

#### **Actions planned to foster and maintain affordable housing**

Brockton's limited supply of affordable housing is one of the community's most significant barriers to fair housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are more likely to be low income households.

The City of Brockton will continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including increased housing opportunities.

#### **Actions planned to reduce lead-based paint hazards**

In the 2013 program year, the City of Brockton provided \$50,000 of matching funds for an award by HUD's Office of Healthy Homes and Lead Hazard Control to the Self Help Inc. Due to the CDBG budget cut this year and in addition to the closing of Self Help Inc.'s deleading program in Brockton, there will be no funding specifically allocated for lead-based paint removal. In this annual plan, the City of Brockton has allocated \$280,000 for the Homeowner Rehabilitation Program with expected outcome of 10 properties to be rehabilitated. Should funding allow, the BRA will make the best effort to reduce, if not eliminate lead based paint from properties eligible under this program.

#### **Actions planned to reduce the number of poverty-level families**

Most activities undertaken by the City with CDBG, HOME and other federal and state funds for low

income families are efforts to reduce the number of persons in poverty and improve the quality of life for Brockton residents, either directly or indirectly. City staff also works in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

CDBG programs which can be used and which directly influence the household income level include: job training, job counseling and placement, education and business development.

In the near future the focus will be on job development and economic stabilization.

CDBG and HOME programs can be used and can indirectly influence the impact on household living by those at or below the poverty level, by reducing other costs including, affordable housing, energy efficiency, public transportation and health care assistance.

In the near future the City will be funding the following indirect activities:

- Housing rehabilitation including energy efficiency improvements
- Health services – both physical and mental
- Revitalization and economic development activities

The City's new Annual Plan for FY2014 offers its support of those projects and programs that bring income stability to Brockton's low and moderate income households including those projects and programs that generate or retain jobs or provide workplace preparedness programming.

In 2014-2015 the City proposes funding such initiatives including the following:

**Father Bill's and Mainspring – Work Express Program** - The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.

**Old Colony YMCA David Jon Louison Family Center** – The Old Colony YMCA provides programs for families experiencing homelessness. The program provides emergency shelter and housing, case management and support services to families in order to reach a higher level of self sufficiency.

### **Actions planned to develop institutional structure**

The Brockton Redevelopment Authority (BRA) and the Brockton Housing Authority (BHA) will carry out the FY2014 Annual Plan on behalf of the City of Brockton. The BRA and the BHA are accountable to the Mayor, as Chief Executive Officer of the City of Brockton. Day-to-day responsibility for administration of

the CDBG and HOME programs and certain other grant funded activities will rest with the CDBG Director of the BRA and the Executive Director of the BHA respectively. The Brockton Redevelopment Authority Director will also be responsible for energy policy coordination and long-term planning functions on behalf of the City. The BRA had the responsibility for preparing, submitting and implementing all previous Consolidated Community Development Plans and Action Plans as well as for managing the consultation and Citizen Participation processes, preparing annual CAPER(s) and interacting with HUD representatives. The BRA previously played a central and critical role in the planning, implementation and coordination of Brockton's multi-faceted and interrelated community and economic development efforts. As the BRA partners with other public agencies such as the Brockton Housing Authority and with community based and/or private organizations in order to carry out projects and programs covered by the Consolidated Plan, the BRA nonetheless will remain the agency ultimately responsible for administering those programs.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of Brockton's low income population. BRA Staff will meet with sub-grantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The BRA Staff will also meet with non-profit and public housing providers to reassess needs and opportunities.

The Brockton Redevelopment Authority and Brockton Housing Authority regularly interacted with locally and regionally based agencies and community-based organizations seeking ideas and input as to the most pressing needs facing the City of Brockton, particularly its low- and moderate-income and minority populations. Again this year, the BRA and the BHA relied heavily on these consultations in developing this Annual Action Plan. The BRA and BHA encourage and maintain open lines of communication with all of these organizations and agencies. This has been the case in the development of the Annual Action Plan as well as the Consolidated Five Year Plan.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction

\$78,473.00 of Program Income has been received by the Brockton Redevelopment Authority during this past year. All of these funds have been allocated to specific programs specified in the annual plan.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	78,473
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>78,473</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

There are no other forms of investment at this time.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Resale and Recapture Guidelines apply when a homebuyer or developer is assisted with HOME Investment Partnerships Program funds and the homebuyer sells or transfers ownership of the assisted property during the period of affordability (see appendix for the Guidelines).

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

#### *Resale Provisions*

A. Activity Types – Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.

B. Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units “designated as affordable units” shall meet the criteria listed under the Resale and Recapture Guidelines.

#### *Recapture Provisions*

A. Activity Types – Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyers as down payment, closing costs and/or purchase price assistance.

B. Methods – the recapture option allows the City of Brockton to recapture the HOME subsidy, subject to net proceeds, if the HOME recipient decides to sell the unit within the period of affordability at whatever price the market will bear. All HOME-assisted unit sales under the recapture option shall meet the criteria listed under the Resale and Recapture Guidelines.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Consistent with 24 CFR Part 92.254(a)(4), the following minimum period of affordability shall be enforced:

<u>HOME amount per unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There is no refinancing proposed at this time.

## **Discussion**

Notification of the availability of funding applications for the HOME funds is made during a public hearing, held in January for the upcoming fiscal year, commencing in July. Applicants are informed during the public hearing that application packages are available on the Brockton Housing Authority's web-site. The application process is outlined in the funding application. The application informs the applicant of the availability of funds; eligible applicants; loan terms; eligible uses of funds; compliance requirements; terms of affordability; income eligibility; and rent limits. Proposals are reviewed on a competitive basis.

## Appendices

# City of Brockton

## Resale and Recapture Guidelines for Homebuyers

### 24 CFR 92.254(a)(5)

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These guidelines apply when a homebuyer or developer is assisted with HOME Investment Partnerships Program funds and the homebuyer sells or transfers ownership of the assisted property during the period of affordability.

#### *Period of Affordability*

Consistent with 24 CFR Part 92.254(a)(4), the following minimum period of affordability shall be enforced:

<u>HOME amount per unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

#### *Resale Provisions*

- A. Activity Types – Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.
- B. Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units “designated as affordable units” shall meet the following criteria:
  - The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family’s principle residence.
  - The sales price must be “affordable to a reasonable range of low-income homebuyers”, defined as a family at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
  - Under no circumstances may the “affordable” sales price exceed 95% of the median purchase price for the area.

- Net proceeds from the sale must provide the original homebuyer, now the home seller, a “fair return” on their investment (including any down payment and capital improvement investment made by the owner since purchase. Capital improvements are not considered to be normal “wear and tear” or maintenance replacement items. In general, the City of Brockton shall consider “fair return” to be the maximum sales price as calculated using the following formula:

$$\text{Maximum Permitted Resale Price} = \left( \frac{\text{The initial sales price to the Owner}}{\text{Initial Area Median Income}} \right) \times \text{Resale Area Median Income}$$

Initial Area Median Income is defined as the Area Median Income corresponding to a household size at the time of the Owner’s purchase of the home.

Resale Area Median Income is defined as the Area Median Income corresponding to a household size at the time of the Owner’s Notice of intent to sell the home.

- C. Enforcement Mechanisms – Resale requirements shall be enforced through deed restrictions, covenant, land use restriction agreement, or other similar mechanism filed with the Plymouth County Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

#### *Recapture Provisions*

- A. Activity Types – Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyers as down payment, closing costs and/or purchase price assistance.
- B. Methods – the recapture option allows the City of Brockton to recapture the HOME subsidy, subject to net proceeds, if the HOME recipient decides to sell the unit within the period of affordability at whatever price the market will bear. All HOME-assisted unit sales under the recapture option shall meet the following criteria:
- The homebuyer may sell the property to any willing buyer.
  - The sale of the property during the period of affordability triggers repayment of the direct HOME subsidy, subject to net proceeds, to the City of Brockton HOME Investment Partnerships local account, that the buyer received when he/she originally purchased the home.

- C. Enforcement Mechanisms – Recapture provisions shall be enforced through a mortgage filed with the Plymouth County Registry of Deeds, and a note file at the offices of the Brockton Housing Authority, administrator of the City of Brockton HOME Program. The requirements within shall be triggered upon sale or transfer of the HOME-assisted property.
- D. Amount of Repayment – The City of Brockton requires that when the recapture requirement is triggered by a sale (whether voluntary or involuntary), it will recapture the HOME Investment up to the total net proceeds remaining after the sale as modified by program specific choices under 24 CFR Part 92.254(a)(5)(ii)(A)(2) *Reduction during affordability period* . The City of Brockton elects to reduce the HOME investment amount subject to recapture on a pro rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period. Net proceeds are the sales price minus the superior non-HOME loan repayment and any closing costs.
- E. Mortgage Discharge – Upon receipt of recaptured funds, the City of Brockton, shall prepare a discharge of mortgage document for the original homebuyer to record with the Plymouth County Registry of Deeds to discharge the original HOME-assisted homebuyer from the requirements of the mortgage.
- F. Repayments – Repayments of recaptured funds shall be remitted directly to the City of Brockton HOME Investment Partnerships Program local trust account.

**CITY OF BROCKTON PUBLIC MEETING  
BROCKTON REDEVELOPMENT AUTHORITY  
ANNUAL PLAN APPLICATIONS  
GAR ROOM – CITY HALL  
JANUARY 15, 2014 - Minutes of Meeting**

**5:00pm** – Paul Morrison, Brockton Redevelopment Authority welcomed all those in attendance at the public meeting. Mr. Morrison provided information relating to eligible activities for HOME and CDBG funding. In accordance with the Department of Housing and Urban Development regulations and amendments, all grants must serve in excess of 70% of CDBG funding will benefit low and moderate income people in the city of Brockton and 100% of HOME funds for low / mod benefits.

Staff Members of the Brockton Redevelopment Authority and Brockton Housing Authority in attendance:

Kevin Harriman, Brockton Housing Authority  
Robert Jenkins, Interim Executive Director, Brockton Redevelopment Authority  
Paul Morrison, CDBG Program Manager, Brockton Redevelopment Authority  
Ewana Lindo-Smith, Director of Finance, Brockton Redevelopment Authority  
Sherry Zou, CDBG Project Manager, Brockton Redevelopment Authority

Mr. Harriman and Mr. Morrison informed that attendees of potential level funding of CDBG and HOME funding for the upcoming year. Funding could be similar in all programs.

**Citizens in attendance:**

Brian Moriarty, NeighborWorks of Southern Mass  
Vivian Rene, Old Colony YMCA  
Barbara Duffy, Brockton Area Multi Services, Inc.  
John Yazwinski, Father Bills and Mainspring  
Brian O'Connor, South Coastal Counties Legal Services  
John Eastman, Self Help Inc.  
Maria Pinto, Cape Verdean Association

Meeting was opened to anyone in attendance to provide an overview of their specific projects or activities they will be requesting funds from 2012 plan year funding.

**5:05 pm - Maria Pinto, Cape Verdean Association** provided an overview of the after school program for children in the City of Brockton. The program provides assistance with English as a Second language, home work assistance, and a variety of other programs that provides children with a means of staying away from the lures of drugs and violence.

**5:10 pm – Vivian Rene, Old Colony YMCA** provided information relating to three programs being run at the YMCA. Camp Massasoit is a program that provides low/mod children with numerous activities, transportation and lunch during the summer months. The main focus of the program is to provide guidance to these children and help them grow.

The second program Mr. Rene spoke of is the Cosgrove Swimming Pool. This program is also a summer program that provides recreational activities during the summer months. The pool has been run by the YMCA for 25 years. During the summer months the pool is open to residents seven days per week, 1-5 pm. Attendance daily is approximately 250 persons.

Additionally, Mr. Rene provided information regarding the work being conducted at the David Jon Louison Family Center. This center is currently housing woman and children who are homeless and in some cases victims of abuse. CDBG funds are being requested to partially pay Case Workers at the DJL center. Case Workers provide a multitude of services for the homeless persons, including training, education, etc.

**5:15 pm – Barbara Duffy, Brockton Area Multi Services Inc. (BAMSI)** spoke of the two programs that depend upon CDBG funding as well as other contributions to provide these services.

- BAMSI Helpline provides assistance to citizens who are struggling to make ends meet. Fuel assistance, rental assistance, etc. are only two of the many services provided
- BAMSI Dorn Davies Sr. Center provides a variety of services to the elderly here in the city of Brockton. Nutritional, recreational, social and health assistance are only a few of the many services. Barbara specifically mentioned the Brown Bag Program as a specific service in which literally hundreds of elderly citizens are provided with bags of groceries each month.

**6:10 pm – Brian Moriarty, NeighborWorks of Southern Mass-** provided information relating to the three programs being operated by NHS and the need for HOME funds is essential. Brian discussed programs currently in progress at NHS (Down payment Assistance, Foreclosure Counseling and First Time Homebuyer) and is requesting funding for each of these programs.

**6:13 pm – John Yazwinski, Father Bills and Mainspring** discussed the work that Father Bills does to provide assistance to the homeless men and women in the City of Brockton. CDBG funds are being requested for the Work Express program. Work Express is a program that provides assistance to men and women who have become homeless. This program helps these individuals get back into the work force through training and education.

**6:21 pm - John Eastman, Self Help, Inc.** provided an overview of the current Lead hazard Reduction Program and informed the group that his organization would have no trouble of removing lead paint from and meeting the target of 125 units established at the beginning of the program. In addition, Mr. Eastman informed the attendees that because of this program, 32 children below the age of 6 years old have been eliminated from the dangers of lead poisoning. Mr. Eastman indicated that his organization would be requesting a grant from the federal government and if received, he would require a matching fund from CDBG funds.

**6:23 pm - Brian O'Connor, South Coastal Legal Services** provided an overview of the assistance provided to the citizens of Brockton using CDBG funding. Those services include Sanitary Code violations, Eviction notices, and Foreclosure notices. South Coastal also works in conjunction with a variety of agencies throughout the city including BAMSI, NeighborWorks, Self Help Inc., etc.

**Paul Morrison** informed the attendees that it is imperative that instructions are followed and applications are dropped off no later than 12:00 pm on February 14, 2014. It was also explained that the application may be obtained electronically on the Brockton Redevelopment Authority web site at [www.brocktonredevelopmentauthority.com](http://www.brocktonredevelopmentauthority.com). Additionally, there is another document entitled Section 504 that must be completed as required by the U. S. Department of Housing and Urban Development. Section 504 requires that all sub-recipients receiving federal funding comply with all regulations pertaining to removing architectural barriers from handicap and elderly individuals.

The Brockton Redevelopment Authority and Brockton Housing Authority are administrators of the funds and that the ultimate decision relative to who is funded and amount of funding is decided by Mayor Carpenter.

**5:25 pm – Open meeting adjourned**

**CITY OF BROCKTON PUBLIC MEETING  
BROCKTON REDEVELOPMENT AUTHORITY  
ANNUAL PLAN DRAFT  
GAR ROOM – CITY HALL  
April 23, 2014 - Minutes of Meeting**

**6:00pm** – Ewana Lindo-Smith, Brockton Redevelopment Authority called the public hearing to order. Meeting was opened to anyone in attendance to provide comments on the 2014 Annual Plan Draft as well as the City's use of CDBG and HOME funds in general.

Staff Members of the Brockton Redevelopment Authority in attendance:

Robert Jenkins, Interim Executive Director, Brockton Redevelopment Authority  
Ewana Lindo-Smith, Director of Finance, Brockton Redevelopment Authority  
Sherry Zou, CDBG Project Manager, Brockton Redevelopment Authority

**Citizens in attendance:**

None

Comment period is from April 11 through May 12, 2014. All comments must be received in writing at the BRA office before May 12, 2014. The 2014 Annual Plan will be submitted to the U.S. Office of Housing and Urban Development (HUD) on or before May 15, 2014.

**6:23 pm – Open meeting adjourned**



855-464-7669

Working Together for Strong Communities

www.nwsonma.org

January 15, 2014

Dear Mayor Carpenter,

Thank you for this opportunity to express my views both as a resident of the city and as Director of NeighborWorks Southern Mass on the proposed usages of available FY 2014 CDBG and HOME funds.

Since the beginning of the recent recession in 2008, the City of Brockton experienced unprecedented number of foreclosures of residential real estate due both to unemployment and the prevalence of sub-prime mortgages and since 2008 NeighborWorks Southern Mass (NWSOMA) served over 850 Brockton residents with free foreclosure counseling. Many of the homeowners we assisted were able to avoid foreclosure through loan modifications, short-sales or refinance. There is empirical evidence cited in an Urban Institute study commissioned for HUD that indicates a correlation between homebuyer education and foreclosure; if you receive this type of education, you are much less likely to experience foreclosure. First-time Homebuyer Education is critical to the future of sustainable homeownership in our City so that the mistakes of the past are not repeated.

As the economy begins to improve, many indicators point to a revitalized real estate market, however because of new strict underwriting guidelines, credit for residential lending is tight. NWSOMA has put forth an effort to help homeowners with acquiring their first home by offering a Downpayment Assistance program to those that purchase in Brockton. Though small in amount (\$2,500) it is significant in the lending process and the buying ability of the first-time homebuyer. I encourage the City to explore any available funding opportunities to expand downpayment assistance.

Because of the age of the housing stock in Brockton, a majority of dwellings have lead paint. Lead paint can be a danger to young children and its presence can complicate real estate transactions. In addition, for many new homeowners, bearing the cost of lead paint abatement is almost impossible. MassHousing offers a lead loan, however many times these loans will push the homeowner to unrealistic debt-to-income ratio levels. Would these federal funding sources be available to subsidize a Mass Housing loan to aid a homeowner with lead paint remediation?

Thank you,

Brian Moriarty, Director  
NeighborWorks Southern Mass



**Quincy**

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Fax: (617) 770-2219

**Brockton**

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**New Bedford**

80 River Street,  
New Bedford, MA 02744  
Tel: (774) 328-9925  
Fax: (774) 328-9927



## *Brockton, Massachusetts*

*"City of the Future"*

*Bill Carpenter – Mayor*

Brian Moriarty, Director  
NeighborWorks Southern Mass  
68 Legion Parkway  
Brockton, MA 02301

Dear Mr. Moriarty,

Thank you for your interest and views on the proposed usages of CDBG and HOME funds for the 2014 program year. More importantly, I want to thank you and your staff for the work your organization does to assist the citizens of the City of Brockton. The Foreclosure Counseling and First Time Homebuyer programs you provide are an essential part of significantly reducing foreclosures in Brockton. Those households that received help from your organization are very fortunate to have been included in such a valuable and successful program.

With regard to the Downpayment Assistance Program, it is my understanding that Neighborhood Stabilization Program funds (NSP1) have been used in the past to help fund this program and the Home Investment Partnerships (H-OWL) funds were used previously for the same program. I will discuss our options for funding this program with both the Brockton Redevelopment Authority as well as the Brockton Housing Authority.

I am aware that lead paint is a major issue in Brockton as a result of our aging housing stock. The City of Brockton has been working with Self Help Inc. over the past few years on this very issue. In the past, Self Help Inc. has received over \$7,000,000.00 in grants from the federal government and the Brockton Redevelopment Authority has provided over \$100,000.00 of federal funds that are utilized in assisting homeowners with lead remediation. Although I am aware that these funds are primarily used to assist existing homeowners, and your experience is with either new or potential homebuyers, I will once again discuss this with the Brockton Redevelopment Authority to determine if we are in a position to provide funding to this program.

Thank you again for your continued efforts of ending foreclosures and sustaining homeownership for the citizens of our City.

Sincerely,

Bill Carpenter  
Mayor

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